Appendix O

Comment Response Tables

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Comment Response Tables

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SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: RD/RA Work Plan DOE/ID-10889

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
1	General	—	No mention is made of the construction of the SSSTF within CPP-95 with the exception of discussion of AOC. Suggestion It should be mentioned that the area has windblown Cs-137 contamination which is expected to be surficial and that the 95% UCL concentration of 5.9pCi/g does not represent an unacceptable industrial risk to workers or site visitors.	The document was revised to state that the work to be performed, as part of construction of the SSSTF, will be conducted within the WAG 3 AOC – CPP-95. See Section 1.2, page 1-3.
2	Sect 1.2.1, 1st bullet	1-5	The description in the text of the EDF-1540-Waste Inventory Design Basis states that the anticipated waste streams are based on the CERCLA Waste Inventory Database Report for Operable Unit 3-13 Waste Disposal Complex (CWID). The CWID, however does not provide a comprehensive analytical assessment of the subject sites but a compilation of the available analytical data and/or process knowledge. The accuracy of the CWID data will only be established as site specific analysis is performed and the results compared with the CWID predicted concentrations and constituents.	No change to the document. The text references EDF-1540 because this EDF was a piece of the 30% PDR used in developing the RD/RA WP for SSSTF but so was the CWID and EDF-264. No change will be made to EDF-1540 or the text because this document was not included with the RD/RA WP package.
3.	Sect 1.2.1, 1st bullet	1-5	The section concludes with the statement that "An analysis of available waste data determined that no waste sites require organic treatment." which suggests that the author(s) assume that there are no organic contaminants at any of the sites that will require treatment. The text should include a statement that soils and other materials will be sampled and analyzed to provide analytical verification of all potential contaminant types prior to determining the required processing for disposal in the ICDF.	No change to the document. In evaluating the organic constituent concentrations, no organic constituents were found that exceed the treatment standards. Therefore, treatment for organic constituents was deemed unnecessary. Verification and QA sampling requirements for the waste streams will be provided in the ICDF Complex RA WP. This will be addressed through verification sampling for organic contaminants. If significant organic contaminants are identified, then a revision to the appropriate work plan will be required.
4.	Sect 2.1.2.1.1	2-6	Need to specify code edition of ASCE 7 (-95) or current adopted for all. (ASCE 7 has no year associated with it, but UBC-97 is specified)	Text was modified to ASCE 7-98. See Section 2.1.2.1.1, page 2-7.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
5.	Sect 2.1.2.1.1	2-6	Need to define "natural phenomena performance category (PC)".	Text was added to the document in Section 2.1.1, page 2-2, stating that Performance Category (PC) is the parameter used in the design and analysis of new and existing DOE facilities. This parameter ensures that the level of conservatism used in the Natural Phenomena Hazard (NPH) design or evaluation process is appropriate for facility occupancy and other characteristics such as importance, cost, and hazards to people on and offsite and to the environment. Various criteria and levels of rigor are associated with the design and analysis of DOE facilities depending on the PC of the facility. The process of determining the PC for any structure, system, or component (SSC) is given in DOE-STD-1021. For the SSCs of the SSSTF the PC has been determined to be PC-1. This is defined in the above standard as follows: a. an SSC with potential human occupancy or b. SSC failure may cause fatality or serious injuries to in-facility workers or SSC failure can be prevented cost-effectively by NPH design. Additionally, to be a PC-1 facility there need to be no "safety class" or "safety significant" SSCs as defined by the safety analysis (SA).
6.	Sect 2.1.3	2-8	Need to Provide structural design criteria for the Decontamination Facility based on DOE-ID AE Standards for snow, wind and seismic loads.	Text was revised in Section 2.1.3.2, page 2-9 to indicate that the structural criteria for the decontamination building is the same as the Administration Building.
7.	Sect 2.1.4.3	2-13	Need to Provide structural design criteria for the mixer building for the Soil Stabilization Treatment Process for snow, wind and seismic (will this be in the Decontamination Facility?)	Text was revised in Section 2.1.4.3.5, page 2-15 to indicate the structural criteria for the Treatment Process Equipment. The text was also revised in the procurement specification for the equipment in Appendix B-1, Subappendix B.
8.	Sect 2.3, General	2-17	Correct the DOE-ID Architectural Engineering Standards from "Latest Edition" to the correct edition that the facility was designed. The current adopted DOE-ID Architectural Engineering Standards state the use of the IBC 2000, this is not part of this design package. If the current DOE-ID AE Standards are to be employed, use the citations for the IBC as noted in the DOE-ID Architectural Engineering Standards (dated November, 2001 Revision No 28)	The document was revised to reference Version 28 of the A-E Standards. See Section 2.3, page 2-17.
9.	Sect 3.1.1.3	3-2	Insert "soil compaction is required to meet 95% dry density" of the proctor as determined by AASHTO T99.	The text in Section 3.1.1.3, page 3-2 was revised to state: "Soil compaction is required to meet 95% dry density...". Additional details are found in the specifications in Appendix C.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
10.	Sect 3.2.1.6	3-4	Provide for anchorage of the administrative facility to the cast in place concrete piers. What is the length and width of the ramp and stairs.	No change to the document. This design information can be found in Appendices C and D.
11.	Sect 3.3	3-5	State the type of building for the Decontamination facility. (Pre-engineered)	The text in Section 3.3, page 3-5 was revised to state that the decontamination building is an Engineered metal building and is qualified under the Uniform Building Code Type IIN construction. Type IIN construction stipulates non-combustible materials.
12.	Sect 3.3.1	3-6	Suggest placing insulation in the precast void to cut down on condensation within the voids. The "precast voided slab" consists of panels. Revise text.	Text in Section 3.3.1, page 3-6 was revised to replace wording "precast, voided slab" with "precast hollowcore panels". Condensation in voids historically not a problem in other similar H&V installations at the INEEL.
13.	Sect 1.4	B-8	Define "Purchaser" as stated in 5.1.5.	This comment is in reference to the Procurement Specification in Appendix B-1. No change to the document. However, the INEEL is the "Purchaser".
14.	Sect 5.1.5	B-17	Where is Drawing A-1 located? There is a drawing at the end of the section without any sheet border on it or any indication of the drawing number.	This comment is in reference to the Procurement Specification in Appendix B-1.Will clarify drawing title to indicate that this is Drawing A-1.
15.	Sect. 1.2.2	1-7	As we have received no notice pursuant to Paragraph 28..2(e), the availability of funding cannot be a rationale for the phased approach.	This section was deleted in response to EPA Comment #27.
16.	Sect. 2.1.1.4	2-3	The rationale for the 6ft high fence should be provided. Suggestion: The 6ft heighth should be sufficient to keep out unknowing entry but a discussion is necessary concerning whether the fence is by itself effective for unauthorized entry or do other security measures supplement its effectiveness, e.g., proximity to the INTEC facility security? Also, the effectiveness of security to minimize the potential for community or environmental risk from animals frequenting the area who later become part of the food chain.	The text was revised in Section 2.1.1.4, page 2-3 to indicate that the 6 ft. woven mesh fence is required for a chemical waste landfill for PCBs as specified in 40 CFR 761.75(b)(9).

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
17.	Sect. 2.1.4.3	2-13	What is the basis for the assumption that boxes are 85% full, as boxes would be empties and their contents treated ex situ? Suggestion: 15% void space is not acceptable for wastes to be landfilled.	No change to the document. This assumption only applies to soil and not debris treatment. Regardless of the amount of waste in the box, it will be treated ex situ in a stabilization mixer. This assumption was only provided for planning purposes to help in waste off-loading to the treatment unit.
18.	Sect. 2.1.4.3.8	2-15	The definition provided should be quoted directly from 268.2(g). For example, radioactive lead solids are also not debris.	The following definition, as extracted from 268.2 was inserted into the document in Section 2.1.4.3.9, page 2-15: "Debris means solid material exceeding 60 mm particle size that is intended for disposal that is: A manufactured object; plant or animal matter; or natural geologic material. However, the following materials are not debris: Any material for which a specific treatment standard is provided in Subpart D, part 268, namely acid batteries, cadmium batteries, and radioactive lead solids; Process residuals such as smelter slag, and residuals from the treatment of waste, wastewater sludges, or air emission residuals; and Intact containers of hazardous waste that are not ruptured and that retain at least 75 % of their original volume. A mixture of debris that has not been treated to the standards provided by 268.45 and other material is subject to regulation as debris if the mixture is comprised primarily of debris, by volume, based on a visual inspection."
19.	Sect. 2.8	2-21	Suggestion: Electronic data bases will reduce the need to maintain copies of written records but is not a substitute.	No change to the text. Hard copies of all necessary paperwork will be maintained and supplemented by an electronic database. This will be further addressed in the ICDF Complex RA Work Plan.. It should also be noted that this section is called "Plans For Minimizing Environmental And Public Impacts" which is intended to reduce the total amount of paper produced as pollution prevention.
20.	Sect. 3.1.1.6	3-3	Where are the "special conditions" for CPP-88 described? They should at least be be referenced here.	The sentence discussing the special conditions was deleted from the text in Section 3.1.1.6, page 3-3.
21.	Sect. 3.2.3.1	3-5	The written "hard copy" should be comsidered the "official copy" as the electronic data is transcribed from it.	No change to the text. Hard copies of required documents will be maintained as necessary to meet the requirements of the WAC and O&M Plan. The "official copy" will be a "hard copy" document.

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DOCUMENT TITLE: RD/RA Work Plan DOE/ID-10889

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
22.**	Sect. 3.3	3-5	Although the concept of "generator" may have utility in describing operations, DOE-ID is the generator, transporter and waste management facility operator for purpose of implementing this CERCLA remedial action. Otherwise, transfer between operations would be considered "off-site."	The text was revised to globally change "generator" to "generating site" or "generating site personnel".
23.	Sect. 3.3.2	3-6	The excerpt from 264.175(c) is not complete as certain waste streams still require containment, e.g., F027	At the present time there are no F021, F022, F023 F026 or F027 wastes included in the inventory. The INEEL does not produce or manufacture these wastes and therefore it is highly unlikely that may of these waste streams will be sent to the ICDF complex. However, should such a waste be identified it will be put in an area which has secondary containment. A statement was added to Section 3.3.2, page 3-6 that says "Wastes containing F021, F022, F023 F026 or F027codes will not be stored on this pad."
24.	Sect. 3.3.6	3-7	The process by which decon water entering the lift station will be checked against the evaporation pond waste acceptance criteria prior to transfer needs to be described.	This process will be addressed in the ICDF Complex RA Work Plan.
25.	Sect. 3.3.7.2	3-9	The definition provided should be quoted directly from 268.2(g). For example, radioactive lead solids are also not debris.	The following definition, as extracted from 268.2 was inserted into the document in Section 3.3.7.2, page 3-9: "Debris means solid material exceeding 60 mm particle size that is intended for disposal that is: A manufactured object; plant or animal matter; or natural geologic material. However, the following materials are not debris: Any material for which a specific treatment standard is provided in Subpart D, part 268, namely acid batteries, cadmium batteries, and radioactive lead solids; Process residuals such as smelter slag, and residuals from the treatment of waste, wastewater sludges, or air emission residuals; and Intact containers of hazardous waste that are not ruptured and that retain at least 75 % of their original volume, A mixture of debris that has not been treated to the standards provided by 268.45 and other material as subject to regulation as debris if the mixture is comprised primarily of debris, by volume, based on a visual inspection."

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
26.	Sect. 3.3.7.2, Last Bullet	3-10	After curing, QA testing is needed to insure that the performance specification, e.g., maximum void space, is met	No change to the text. The performance specification for debris treatmcnt by microencapsulation is "reduce leaching potential". QA associated with debris treatment will be discussed in more detail in the O&M and following completion of the ICDF Landfill WAC.
27.**	Sect. 4.1	4-1	It is important to identify the logic flow for deciding whether or not to pursue Phase 2 and how the State and EPA will interface pursuant to the FFA/CO.	All detailed discussion of Phase 2 in Sections 1.2.2 (pages 1-7 and 1-8) and 4.1 (pages 4-1) were deleted from the document. Text was added stating that further investigation of known or potential waste streams has not resulted in the need for a larger treatment facility than is currently planned in this RD/CWP. If in the future, the need for a large or additional type of treatment is identified; scoping would be initiated along with the subsequent development of FFA/CO design and operational documents. If the additional treatment capacity or type is identified, a modification to the OU 3-13 RD/RA SOW will be developed and submitted to the Agencies for incorporation.
28.**	Sect. 4.5.2	4-6	The Prefinal inspection checklist, although drafted by the contractor, is for use by the Agencies and thus subject to revision or modification at the State's and EPA's discretion.	The text was revised in Section 4.5.2, page 4-6 to state "draft Prefinal Inspection Checklist for revision and use by the Agencies."
29.	Sect. 4.5.3	4-7	The Prefinal inspection report includes a copy of the State's and EPA's separately completed prefinal inspection checklists and DOE's proposed schedule and recommendations for correction	The text in the second bullet of Section 4.5.32, page 4-7 was revised to state: "Completed Inspection Checklist from each Agency..."
30.**	Sect. 4.7, 5th Para.	4-8	All substantive remedial design, operations, maintenance and monitoring procedures for implementing the remedial action need to be included in FFA/CO recognized documents. Suggestion: TPR's may supplement procedures identified in primary documents but are not a substitute unless they are subject to the FFA/CO document modification procedures.	No change to the text. The regulatory and technical requirements along with the operating philosophy for the implementing procedures will be presented in the O&M plan. The O&M plan will be a part of the ICDF Complex RA WP. The O&M plan will not be to the TPR level, as TPRs are internal and modified as necessary. However, the O&M plan requirements and philosophy will form the basis of the TPRs.
31.**	Sect. 4.7	4-9	Given that the bulk of the waste going to the ICDF is radiologically contaminated and the ALARA concerns that such waste presents, a radiological survey should be conducted on all loads entering the SSSTF	No change to the text. Appropriate radiological surveys of the waste will be conducted prior to final disposition. This will be discussed in the O&M plan and the Waste Approval Form.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix A, TFR-17, Rev. 2

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
32.**	Table 1.6-1, A-1	10	The SSSTF should not be used to store TRU wastes indefinitely. Also, TRU mixed wastes going to a RCRA/HWMA permitted Storage Facility is off-site and subject to 40 CFR 300.440 requirements.	No change to the text. It is not the intent of the SSSTF to be used for long term storage of any waste. TRU waste may be stored (short-term) until an appropriate long-term storage or permanent disposal facility has been identified. When sent to an off-site facility, 40 CFR 300.440 requirements will be met.
33.	Table 1.6-1, G	10	Procedures for the management of secondary waste aqueous liquids is not specified	No change to the text. The ICDF Complex RA WP and the Waste Approval Form will discuss the requirements for the management of secondary waste generation.
34.	Table 1.6-1, L	11	Although the concept of "generator" may have utility in describing operations, DOE-ID is the generator, transporter and waste management facility operator for purpose of implementing this CERCLA remedial action.	See response to Comment #22. Changed to "generating site".
35.	Table 1.6-1, Q	11	The phrase, "significantly contaminated with organics" requires clarification. Suggestion: It may be appropriate to specify that no wastes will contain organic COC's at concentrations greater than, e.g., 0.5 % of the universal treatment standard listed at 40 CFR 284.48.	The document will be revised to indicate that the SSSTF will not be treating organically contaminated soil or debris above the 268.48 standards. This will be further evaluated in the ICDF Complex RA WP and modified as necessary.
36.	Fig. 2.1-1	14	The procedure for managing how 'free liquids' will addressed should be included. Suggestion: An arrow connecting box 2.1.1 to 2.1.2 may resolve this concern	The document will be revised to add the arrow between box 2.1.1 and 2.1.2.
37.	Table 3.1-2	30	DOE Order 435.1 & 5400.5 were already identified as ROD TBC's	The references will be removed from this table.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B1, EDF-ER-296 Draft

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
38.	Table 1, General	4	There appears inconsistencies in the debris waste box % fullness. How will full boxes be treated in-situ?	This EDF is describing soils treatment only. The table will be revised to remove all debris waste streams. The soil boxes will not be treated insitu, but rather the soil will be treated through the identified Soil Stabilization System as described in the EDF. Debris Treatment is addressed in Appendix B-2, EDF-1730.
39.	Table 1, General	4	Some of the waste description are insufficient to characterize them as debris, e.g., "miscellaneous"	See response to Comment #38.
40.	Sect. 4	7	MBS was demonstrated under EPA's SITE program, however, as reported in the September 1997 Demonstration Bulkletin (EPA/540/MR-97/507), "Treated wastes/soils passed EPA's multiple Extraction Procedure (As, Cd, and Pb); however, no conclusion could be drawn regarding the effect of treatment on long-term stability..."	The text discussing the MBS technology will be removed from this portion of the document.
41.	Sect. 4.1	7	Laboratory stabilization testing of a percentage of actual stabilized waste should also be conducted for QA.	This will be a requirement addressed in the ICDF Complex RA WP.
42.	Sect. 5.2	9	There appears inconsistencies in the debris waste box % fullness.	See response to Comment #38.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B-1, EDF-ER-296; Appendix B, SPC-1481

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
43.**	General	—	It is unclear how State and EPA review of the contractor-supplied design drawings calculations amd operating procedures will be factored into the RD/RAWP finalization prior to start of construction? Suggestion: The supplemental information could be submitted as an amendment to the RD/RAWP.	Supplemental information will be provided as a modification to this RD/CWP, a primary FFA/CO document subject to a 30 day disputable item identification period. The schedule in Appendix L will be revised to present this information.
44.	Sect 4.8 & 4.9	B13	Supplier shall also submit structural reactions for the major equipment and drawings showing special foundation configurations to accommodate the equipment. This would allow floor slab verification and inclusion of any additional concrete foundation details.	The text in Section 4.8 and 4.9 was clarified to indicate in further detail that this will be required by the Subcontractor as part of the vendor data submittal.
45.	Sect 4.8 & 4.9	B-13	Supplier shall also submit "general arrangement" drawing(s) showing all equipment locations and layout. Additionally, the "general arrangement" drawing(s) shall show minimum and maximum allowable distances between equipment.	See response to Comment #44.
46.	Dwg	B-37	Who is responsible for the confinement tent around the SSS in the Treatment Area? Is this an engineered material or an "off the shelf" material? The confinement tent does not show up on the Architectural drawings.	The design details, if included in the system by the selected vendor, will be provided to the Agencies as a modification to the SSSTF RD/CWP. See response to comment #43.
47.	Dwg	B-37	Who is responsible for the SSS OSHA platform for maintenance? Where is it detailed?	The design details, if included in the system by the selected vendor, will be provided to the Agencies as a modification to the SSSTF RD/CWP. See response to comment #43.
48.	Dwg	B-37	Are hold downs required in the floor slab for tent around the SSS? These hold downs should be detailed on the structural drawings?	The design details, if included in the system by the selected vendor, will be provided to the Agencies as a modification to the SSSTF RD/CWP. See response to comment #43.

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DOCUMENT TITLE: Appendix B-2, EDF-1730; Appendix C, EDF-2693, Draft Final				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
49.	General		What prevents the liquefied grout from escaping through any of the gaps between the plywood corners?	No change to the document. The boxes are fairly tight. Unless there is a defective box leaking should not occur. If there are defective joints they can be closed by installing wood screws. As part of the ICDF Complex RA Work Plan, procedural requirements and performance standards will be developed for inspection of the boxes and repairs as necessary.
50.	General		There should be provisions for boxes that are visibly degraded (checks, splits etc. in the exterior plywood). Place the degraded box into an additional containment unit (place the box within another new oversized wood box) and proceed with grouting operations.	No change to the document. As part of the ICDF Complex RA Work Plan, procedural requirements will be developed for inspection of the boxes and repairs as necessary. If oversize boxes are really required, a larger frame will be required.
51.	Calc sheet 6 of 7, Concl: 3rd bullet		Define time. Based on research, how long will it take the grout to become self supporting?	No change to the document. This depends on the grout formulation and what is meant by self-supporting. The grouting frame support is not required after about 4 hours. However, the box should not be moved for at least 24 hours. As part of the ICDF Complex RA Work Plan, procedural requirements will be developed for cure times. The standby time will be a performance measure.
52.	Dwg S-1/ S-2		A) What prevents the inner frame from falling out during time that there is no box inside or during the time that the box is being inserted into the frame?	The drawing will be revised to add removable retaining pins to the drawing.
53.	Dwg S-1/ S-2		What prevents the inner frame from "hanging up" on the outer frame if the bolts are not tightened using an appropriate pattern.	The space between the frame as designed is 0.5 inches and should allow movement without much chance of "hanging up", particularly if the inner frames are pushed up snug to the box prior to tightening. There are some dimensional corrections to two members, which will be made to the plans to accommodate this 0.5-inch clearance.
54.	Dwg S-1/ S-2		Will the painted surfaces be able to "slide" over each other between the inner and outer frames?	Yes, painted surfaces should be smooth enough to slide. A note specifying smoothing of welds and rounding of corners will be added to the drawing to help with this.
55.	Dwg S-1/ S-2		A tightening pattern for the inner frame bolts should be provided.	No change to the document. The tightening pattern is not very important once the inner frame is snug to the box. The operation of putting the box in the frame and making it snug with the box will require a complete procedure that will be developed.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B-2, EDF-1730; Appendix C, EDF-2693, Draft Final

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
56.	Dwg S-1/ S-2		A welding detail for the HSS to HSS connection should be provided.	No change to the drawing. Covered by note 4 on drawing S-1.
57.	Dwg S-1/ S-2		Are cap plates required on the HSS for cleanliness?	The design will be revised to add caps to the frames.
58.	Dwg S-1/ S-2		Do welds need to be ground smooth at locations where the ½" CS plates are located?	The welding note in the drawing will be revised to state the welds need to be ground smooth.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B3, EDF-1937, Draft Final				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
59.			No comments	

DOCUMENT TITLE: Appendix B4, EDF-2655, Draft Final				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
60.			No comments	

DOCUMENT TITLE: Appendix B5, EDF-1948, Draft Final				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
61.			No comments	

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B6, EDF-2648, Draft Final				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
62.	Summary	1 of 3	Why was an "Ordinary Hazard Group II Occupancy" with a density of 0.17gal/sf assumed? EDF-1948 suggested a worst-case assumption of 0.25 gal/sf. Given that radionuclides and other hazardous substances may be released, this area may qualify as an "Extra Hazard Group 1" Note: High piled storage of moderate to high hazard material is classified as Extra Hazard Group 1. OHGp2 is used for high piled storage of low to moderate hazard material.	No change to the document. The radioactively contaminated materials are not from highly combustible materials (i.e., soil and water) and are not associated with highly flammable material. Radionuclides may be high health hazards, but the evaluation of health and fire is completed independently. The Ordinary Hazard Group II Occupancy is the appropriate fire classification in accordance with NFPA 13 and NFPA 801. Other codes such as the life safety code (NFPA 101 and the building code) determine the appropriate health classification.
63.	Summary	2 of 3	How will the oil/water separator serve to remove the potential high radioactive solids loading, prior to discharge to the evaporation pond?	No change to the document. Based on a flow through rate of 1.0 ft/min the oil/water separator will accommodate 100 gal/min. It is assumed that 2-6 trucks/day will be decontaminated. Assuming 100 gallons per truck and using 6 trucks the quantity of waste water would be 600 gallons per day. Based on a 10 hr day, this amounts to one gallon per min. average. It is estimated that the sediment would be removed 3-4 times per year from the oil/water separator. The issue of sediment loading to the evaporation pond will be addressed with the appropriate WAC (eg., evaporation pond) as part of the ICDF RD/Construction Work Plan. These requirements may then have an impact upon the design of this facility, which would be discussed in the ICDF Complex RA Work Plan.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B7, EDF-2676, Draft Final

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
64.	Section 1.3, etc.	2 of 13	How are four of the 3' x 7' hollow metal doors addressed in the heating assumption of an overall thermal resistance of R-10? Suggestion: Drawing A-7 shows doors 9-11 & 13 as hollow metal.	No change to the document. Ref. Paragraph 1.3 Heating in EDF-2676 it states, "Roof Insulation is R-19 and the wall insulation is R-16. Accounting for parallel heat transfer paths for doors of R-5 or less, wall and roof steel structural elements and floor slag losses, the resulting overall thermal resistance is reduced significantly. Buildings of this construction generally result in an overall thermal resistance factor of R-10. The 4 doors referred to in this question are included in the calculations of the overall building envelope.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B8, EDF-302, Draft Final				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
65.	General		A scenario that should have been included in the analysis is the potential for high winds to generate dust which fumigates downwind observers as the load is inspected for waste acceptance. Suggestion: Whether this occurs at the excavation site or the ICDF complex gate, the responsibility for safe operations should be addressed here.	No change to the document. The waste will be inspected pursuant to the Waste Approval Form at the dig site and/or sampled, then transported to the SSSTF in covered or sealed containers. Waste inspection will not be performed at the SSSTF; therefore, there is no exposure pathway other than direct radiation.
66.	Sect 3, 6th Para	3-1	Given the concern that the community and non-rad workers not be exposed to unacceptable risk levels, i.e., >15 mrem/yr, a RadCon ribbon equivalent may be needed to be placed around areas below 5mrem/hr.	No change to the text. This issue is addressed in the ICDF RD/Construction WP (EDF-ER-327) which deals with short-term risk and public exposure.
67.**	Sect 2, 3rd Para	6-3	It states in section 2 that CPP-92 is used as the worst case scenario. However, this really applies to the soil treatment area. Table 3-1 using specific activities for CPP-36/91 with Pu-238 at 7.6 E+3 pCi/g is the worst case value for internal exposure. Suggestion: The Pu-238 activity listed in Table 6-1 is only 2.44E+2 pCi/g	No change to the text. Section 2 states CPP-92 waste stream is the worst case for the soils stabilization process, which is the only process of concern for the SSSTF RD/CWP. Only CPP-92, 98, 99 and CFA-04 (see Appendix 6 for CFA-04) waste streams will be in the stabilization area within the decontamination facility. In this area CPP-92, Pu-238 at 2.44E02 pCi/g is the worst case. In the decontamination part of the decontamination building there is the potential for dust from any of the waste streams. Therefore, in the decontamination area, CPP-36/91, Pu-238 at 7.6E03 pCi/g was used as the worst case. Worker risk exposure for the landfill and evaporation pond operations are evaluated in the ICDF RD/CWP, EDF-ER-327.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B9, EDF-2738, Draft Final				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
68.			No comments	

DOCUMENT TITLE: Appendix B10, EDF-2747, Draft Final				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
69.			No comments	

DOCUMENT TITLE: Appendix B11, EDF-1913, Draft Final				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
70.			No comments	

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B12, EDF-3061, Draft Final				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
71.	Dwgs S2-S4		Provide note for contractor to maintain specified slab thickness throughout all slabs.	The plans have been modified advising the subcontractor that all concrete floor slabs are to be a uniform thickness of 5". Stoops in front of the doors will be 6 inches and the approach slab to the decontamination building will be 10-inches.
72.	Dwg S3, Detail 5		The top slab/grating in section is backwards.	The grating on the detail will be revised to coincide with the P-Trap detail.
73.	Dwg S3, Detail 5		With 3" cover on the bottom reinforcing steel in the pit, there is no room for the second (top) layer of reinforcing or show only one layer of reinforcing.	This slab is 8 inches, which allows for two mats of rebar and is shown on detail 5. Where a 6 inch slab is specified there will only be one mat of #4 rebar. This is detailed on Detail -5 dwg S-3.
74.	Dwg S3		The keyway detail should be provided.	The keyway detail on dwg S-2 will be enlarged and a similar detail will be shown on dwg S3 for the wall.
75.	Dwg S3		Place reinforcing in retaining wall structure around the 5" contaminated equipment pad.	Number 4 rebar steel at 12 inch on center will be added in the retaining wall to provide proper reinforcement.
76.	Dwg S3		Can base of retaining wall structure around the 5" contaminated equipment pad resist moment from soil load and applied surcharge on exterior grade along with load from trench grate and post tension slab?	No change to the document. The retaining wall with #4 rebar at 12-in on center will resist all the soil and surcharge loads applied.
77.	Dwg S3		What is the top cover on the concrete in the bottom of the pits?	1-in. clearance is required and has been added to drawings where it applies.
78.	Dwg S2		What are the width, length and thickness of the approach slab at the overhead doors?	The length and width are 10 ft and 16 ft respectively. Please see Grid D-4 on sheet S-2. The thickness of 10 inches will be added. The reinforcement will consist of two mats of #4 rebar at 12-in on center.
79.	Dwg S2		Provide additional cold reinforcing steel at the re-entrant corners at the trench strut locations (to prevent cracking in the slab from the PT forces).	Continuous #4 reinforcing steel will be provided at the re-entrant corners to prevent stress cracking. See Sheet S-4, Section J.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix B12, EDF-3061, Draft Final

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
80.	Dwg S2		Has P-T slab been designed for mixer and box unloader as shown in Appendix B-1 page B-37?	No change to the design. The controlling loads are in the decontamination bay of the building. Therefore the total slab has been designed for the HS-20 AASHTO Bridge Truck loading including the slab in the treatment area. This loading is in excess of what is required for the equipment in the treatment area but has the same design to reduce costs by the same geometry and to provide ease of construction.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix C, SPC-1485, Draft Final

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
81.	Div 3, 03300	3 of 14	Add Tie wire ASTM A82	Will add tie wire.
82.	Div 3, 03300	3 of 14	Use standard practice Welded Wire Fabric designation (6x6 W1.4xW1.4)	The specs have been changed using the standard designation for welded wire fabric of 6x6 W1.4xW1.4.
83.	Div 3, 03300, Line 40	3 of 14	ACI 318 cannot be used as a maximum delimiter for gradation of aggregate. ACI 318 is only a reference document that provides the "minimum requirements necessary" (See ACI 318-99 page 2)	No change to the design. ACI 318 is a reference document and forms part of the specification to the extent designated (See page 03300-1).
84.	Div 3, 03410, Line 20	2 of 6	If the mezzanine is to be used for storage, Live Load for light storage = 125 psf, Heavy storage = 250 psf. Suggestion: See other comment	The mezzanine will be used for light storage and has been designed for 125 psf. This will also be noted on the plans and specs. See Spec. 03410, page 2 of 6 and Dwg. A-1.
85.	Div 13, 13120, Lines 33 thru 40	3 of 12	Add provision for the subcontractor submission of building foundation reactions and load combinations for design or verification of the building foundations.	The Subcontractor is required to submit shop drawings showing all details of the building he proposes to use. (See Page 3 of 12 Section 13120) In addition a statement has been added requiring the Subcontractor to submit column base reactions for each load case. The shop drawings must be signed and stamped by a registered PE in the State of Idaho. If this submittal results in a significant change to the specifications in the SSSTF RD/CWP, then the work plan will be revised in accordance with the FFA/CO.
86.	Div 13, 13120, Lines 26 thru 33	6 of 12	Who will provide the embedment depth of the anchor bolts? Traditionally, the Structural Engineer of Record for the project performs this task. A provision should be added to the specification for the information to be provided otherwise.	The specifications will be modified to require the Subcontractor to submit calculations that determine proper embedment depth of the metal building column anchor bolts. See Spec. 13120, page 4 of 12.
87.	Div 13, 13120, Lines 5 & 6	7 of 12	The wind load importance factor disagrees with the value stated on drawing A-1. Is the importance factor 1.5 as stated in the specification or 1.07 as stated on A-1? This is a significant difference.	These will be coordinated so that the correct criteria is shown. See also Sheet A-1. (Both drawing and spec now state I = 1.0)

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix C, SPC-1485, Draft Final

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
88.	Div 13, 13120, Line 9	7 of 12	The seismic Importance Factor disagrees with the value stated on drawing A-1. Is the importance factor 1.0 as stated in the specification or 1.25 as stated on A-1? This is a significant difference.	These will be coordinated so that the correct criteria is shown. Also see Sheet A-1. (Both drawing and spec now state I = 1.0)
89.	Div 13, 13120	7 of 12	Add provision for the support of the hollowcore floor slab in the mezzanine area.	No change to the document. As part of the Subcontractor submittals, details showing the method of support of the hollowcore floor slab will be required. If this submittal results in a significant change to the specifications in the SSSTF RD/CWP, then the work plan will be revised in accordance with the FFA/CO.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix C-1, SPC-1484, Draft Final				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
90.	Sect. 5.2.1	5 of 15	Is the wind speed criterion for the AOT different (96 mph) than the rest of the SSSTF Buildings (90 mph)? The balance of the SSSTF buildings are to be designed for a 90 mph wind speed (as stated in RD/RA WP Section 2.1.2.1.1 Structural Requirements).	The correct speed is 90 mph. Section 5.2.1 has been revised to indicate this.
91.	Sect. 1.2 or 1.3	1 of 15	Need to identify who is responsible for any foundation for the ramp and canopy? What is roof slope for the canopies?	The subcontractor will procure the trailer from the Supplier. The Supplier will construct ramp and canopies. Additional details will be provided in the procurement specification to make it clear to the subcontractor of his responsibilities. Roof slope details will be provided in the VDS for approval.
92.	Dwg S-1		The embedment depth of the drilled piers is not provided and should be. There should also be an EDF for the design or estimated design for the foundations for the AOT.	No change to the document. Embedment is clearly shown with elevations on drawing S-1 This layout of the piers is based on various manufactures trailer layout. Minor modifications to the layout may be made depending on which trailer is chosen. The depth is required as 5-ft min by the DOE A-E Standards to be below the frost line. Actual bearing pressures will well within the allowable bearing pressures at INTEC.
93.	Dwg S-1		It is not clear what the number of drilled piers is based on. Is it the number of trailer loads or trailer geometry?	See response to Comment #92.
94.	Dwg S-1		What is the embedment of the reinforcing attached to the anchor plate? Is this also "as recommended by modular trailer manufacturer"?	This will be installed in accordance with the manufacturers recommendations. A clarifying note has been added to drawing S-1.
95.	Dwg S-1		Will the reinforcing steel be welded to the bottom of the anchor plate or will headed studs be allowed?	Unknown at this time. Anchorage for the administrative trailer will be designed by trailer supplier and approved by Contractor in VD process.
96.	Dwg S-1		What is the clear cover on the drilled pier concrete?	The clear cover to the rebar from the edge of the concrete is 1 inch. This was added to drawing S-1.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix D, Design Drawings

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
97.	Dwg C-2		In the Legend, the new building or pad designation shows number 6 and 7 as parking lots, these designations do not show up on the drawing.	Because of the potential for damaging the empty container storage pad with the roll-on/roll-off containers it will be removed from the design. The pavement within the SSSTF will also be removed from the design for cost savings and ease of potential spill cleanup. See drawings, T-3, C-2 and C-3.
98.	Dwgs A1 & A6		The bearing of the precast shown in section K is not called out in the specification.	Min bearing of 3" callout has been added to drawing A-6.
99.	Dwgs A-1 & A-6		Details of connection for the precast to the masonry shown in Section F & G is very difficult to construct. Suggest using a steel angle for connection of the precast to the wall. Placing expansion anchors into the bond beam and welding the steel angle to embedded plates in the hollowcore floor deck. As for Section K, a plate could be embedded into the hollowcore floor plank and welded to the steel beam.	Details are standard details commonly used at INEEL and would provide a more favorable flexible connection in a seismic event. Embed plate added to Section K on A-6. Stud anchorage method previously shown in Section K deleted.
100.	Dwgs A-1 & A-6		How will the hollowcore floor planks be attached together? Provide detail.	No change to the design. The Precast supplier will provide this detail as it is requested on the Vendor Data schedule. If this submittal results in a significant change to the specifications in the SSSTF RD/CWP, then the work plan will be revised in accordance with the FFA/CO.
101.	Dwg A-1		Design loads Hollow Core Dead=75 psf – This is not a conservative assumption. The dead load of an 8" hollowcore with 2" topping varies between manufacturers from 75 psf to 88 psf.	Design load changed to 81 psf.
102.	Dwgs A-1 & A-4		Mezzanine Live Load – Assuming the mezzanine is to be used for light storage (the use is not stated on the drawings) UBC states in Table 16-A "Uniform and Concentrated Loads" that the Live Load for Light Storage is 125 psf and the Live Load for Heavy Storage is 250 psf. Depending on the intended use of the floor, provide the correct live load on the drawings.	The mezzanine will be designed for light storage (125 psf) This will be noted on drawing A-1.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix D, Design Drawings

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
103.	Dwg A-1		How are the partition walls supported at the top of the walls? Are these walls designed as cantilever walls or walls that span horizontally? Provide an EDF for the design of the design of the interior walls, foundations for these walls and the interior light gauge steel framing.	No change to the design. Partition walls are designed as cantilevers. Walls are fairly low height w/ dead load typical. An EDF is not required.
104.	Dwg S-2		For the 30"x48" Door – What kind and where is this specified?	No change to the design. The 30"X48" door is watertight and provides access to the P-Trap. See dwg S-3 Grid C-5.
105.	Dwgs A-4 & S-2		Who is responsible for the concrete stoop and foundations for the canopy at the man door entrances to the building? Where are the foundations and stoop thickness detailed? There should be a frost wall below the stoop so that the frost heave will not raise the slab to prevent the doors from opening.	The subcontractor is responsible for the concrete stoop. Drawing S-2 will be modified to show the thickness. A frost wall is not required because the fill will be constructed with clean granular material. It will be free draining and frost heaves should not be a problem. Based on comparable structures at the INEEL, this has not been an issue.
106.	Dwg A-4		Has handrail been designed per UBC or OHSA standards for handrail? Are (4) – 3/8" bolts adequate to support the code prescribed loads for a handrail. Provide calculation.	No change to the design. The handrail has been designed in accordance with OSHA Stds and will provide support for the applied loads. Design calculations are in the design file.
107.	Dwg S-2		No dimension given for the smooth transition lines to any point of reference.	No change to the design. Top of concrete elevations and tapered slopes are given on the drawings and provide adequate information for the subcontractor to properly construct the slab.
108.	Dwg S-2		Show the floor slope to the trench drain on the right and left sides of the trench as shown on S-2. What is the top of trench grate elevation?	No change to the design. The floor slopes and trench grade elevations are shown on S-2 with details and other elevations shown on S-3.
109.	Dwg S-2		Have the footings been sized for building uplift. The drawings show a lightweight slab with small foundations. Provide an EDF showing estimated building reactions and footing calculations. These calculations should show both the downward forces and uplift forces have been accounted for in the design of the foundations. What is the bearing capacity of the soil?	Preliminary sizing of the footings has been performed and included in the document. See response to Comment #85.
110.	Dwgs S-2 & S-5		Why are the hairpins in the post-tensioned slab necessary? Suggestion: Provide an EDF showing the necessity of the hairpins in the post-tensioned slab.	The hairpins have been removed from the columns. See Dwg. S-5.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix D, Design Drawings

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
111.	Dwgs S-2, S-4, S-5 & A-1		How is the post-tensioned slab to remain post-tensioned when there are slab cuts for the installation of masonry partition walls in the PPE room, RADCON room, hall and showers? Is this area not post-tensioned slab? Drawing S-4 shows post-tensioned slab throughout slabs but the Masonry Wall Section on Drawing S-5 shows a 6" thick concrete floor slab with no reinforcement. Which one is correct?	Masonry wall foundation detail has been revised to include thickened slab footing to support the masonry walls. Slab will be continuous to accommodate post-tensioned tendons to ensure that the slabs are not cut. See Drawing S-5.
112.	Dwg S-4		Post-Tensioned Slab - Grade away from the Post-tensioned slab structure. Water should not pond or in any way collect on the P-T slab for any period of time.	No change to the design. The post-tensioned slab is designed to be free draining. See drawing S-2 and S-5.
113.	Dwg S-5		What is the 2" compacted leveling course? Is this concrete sand or some other material not specified?	This is incorrect on this drawing and will be changed. Six inches of concrete sand is required under the slab where the secondary containment membrane is being planned to protect it from cuts or damage. See details on Dwg S-3 and S-5.
114.	Dwg S-5, Sect E		Are the piers large enough to accommodate the base plate and any portal frame column that may be at non-standard locations?	No change to the design. The selected vendor will provide additional information as part of the vendor data submittal. If this submittal results in a significant change to an existing specification in the SSSTF RD/CWP, then the work plan will be revised in accordance with the FFA/CO.
115.	Dwgs S-2 & S-5		What is the size and reinforcement in the grade beams stated in Detail 3 and Section E? Where are they located on the Foundation and Pad Plan. Suggestion: Provide an EDF showing the grade beam design and assumptions.	Grade beam is shown on S-2 as hidden line. The size and spacing of grade beam rebar has been added to S-5, Section E. The grade beam on this facility is continuously supported on engineered fill. Long experience and many, many examples at the INEEL demonstrate that this type of construction with these details will be adequate for this facility. Thus, no detailed design EDF for the grade beam is required.
116.	Dwg S-5		Additional reinforcement around column blockouts to control slab cracking should be provided.	Blockouts are round so cracking will be minimal. This is called out on Note 1 on Dwg S-5. The details shown on drawing S-2 will be corrected to reflect the circular blockout.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix D, Design Drawings

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
117.	Dwg S-6		Suggestion: Provide an EDF for the design of the support slab for the scale.	No change to the design. General details are given on drawing S-6 to fit most all of potential scale suppliers. The scale supplier is required to submit his specific design, calculations, installation requirements and anchorages on shop drawings for approval prior to construction. If this submittal results in a significant change to an existing specification in the SSSTF RD/CWP, then the work plan will be revised in accordance with the FFA/CO.
118.	Dwg S-6		A frost wall around the perimeter of the slab should be provided.	No change to the design. A frost wall is not required. The slab will be constructed on well-compacted granular, free draining material. This is standard practice for this type of installation at the INEEL
119.	Dwg S-6		Does the scale sit on top of the slab or does it have an embedded mechanism? Where are the attachments to the slab for the scales (if required)?	No change to the design. The scale sits on top of the slab. All attachments and appurtenances will be shown on the shop drawings submitted by the Subcontractor. If this submittal results in a significant change to an existing specification in the SSSTF RD/CWP, then the work plan will be revised in accordance with the FFA/CO.
120.	Dwg S-6		What is the thickness width and length of the "concrete pedestal support for remote display" shown on the Scale Pad Plan.	Dimensions will be added to the drawing to define the length the width and the thickness of the concrete pedestal.
121.	Dwg T-2		This drawing illustrates the general layout of the SSSF site. The drawing shows empty containers stored on a pad with no apparent curbing or sump features to control precipitation runoff and/or spills. Similarly, the contaminated equipment pad shows no apparent containment structures such as curbing and sumps. How will fluids be controlled in these two area that periodically are likely to have liquids accumulate on their surfaces.	Because of the potential for damaging the empty container storage pad with the roll-on/roll-off containers it will be removed from the design. See drawings, T-3, C-2 and C-3. The contaminated equipment pad does have curbing and trench drains to accommodate drainage. See drawings S-2 and S-3.
121. (a) [no item # given by EPA]	Dwg T-2		This drawing also shows a truck holding area; the trucks are apparently loaded (they are pictured with roll off containers) with contaminated materials. Please indicate whether the truck in the holding area will be loaded with contaminated materials or not. If this area will be used to stage trucks loaded with waste please provide discussion of why the gravel surface was considered as opposed to a paved surface.	Because of the potential for damaging the empty container storage pad with the roll-on/roll-off containers it will be removed from the design. See drawings, T-3, C-2 and C-3.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix E, As Built				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
122.	Sect 6.1.1	E-40	Has a "Test Your Tank Kit" been obtained to support periodic maintenance inspections?	No, and no change to the document. Future testing requirements will be discussed in the O&M plan as part of the ICDF Complex RA Work Plan.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix F, INEEL/EXT-01-00777				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
123.	General		Although inspection topics are provided, no information is available on what the inspection will include, e.g., punch list, photographs, report, etc. This should be identified.	The following text will be added to Section 2.1 of the document. Inspection will include physical witnessing of construction activities, performance of civil, mechanical, and electrical tests specified in the specifications and documentation of those inspections. At completion of construction punch list(s) will be used during the turn over from construction to operations. Photographs may be used to document visual conditions of equipment, if deemed appropriate by the inspectors.
124.	Sect. 2	1	The hold points are not identified. Instead, there is mention of final specifications and a final inspection plan. Willl the RD/RAWP be modified later to include these changes?	The following text will be added Section 2.1 to the document. The detailed inspection plan will identify the specific civil, mechanical, electrical, etc. inspections need to verify the SSSTF is installed in accordance with the specifications and drawings. BBWI internal inspection procedures MCP-2482 and MCP-2490 will be used to develop the inspection plans. The results of the inspections will be documented and documents will be available during on-site visits. Ultimately, the inspection documents will become part of the project file and designated as Quality Assurance records. The construction hold points will be provided to the Agencies in the weekly reports.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix G, INEEL/EXT-01-00271				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
125.	Sect 6.4	6.4	Although this document was not reviewed by EPA, as DOE has regulatory authority for ES&H concerns on its facility, the CPP-95 area is also within the OU 10-04 Ordnance area (see Fig 12-1 of August 2001 RI/FS). Given that RDX and TNT are also potential carcinogens, how will the potential for ordnance contaminated soils be addressed?	The following text will be added to the document. The SSSTF construction area will have a comprehensive ordinance survey completed prior to construction activity commencement. Discolored or stained soils identified during the ordinance investigation will be isolated and tested prior to disturbance.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix H, DOE/ID-10873				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
126.	Sect 2.3	2-1	The logic diagram of the soil management strategy of the Institutional Control Plan should be included here to avoid confusion.	No change to the document. Per the 1/10/02 conference call the logic diagram does not need to be included.
127.**	Table 3-1	3-2	Although industrial waste may not need to be disposed of in the ICDF, the CFA landfill is not a CERCLA-facility. A suitability determination is required to insure that disposal at this site does not constitute an unacceptable threat to health or the environment.	A suitability determination for disposal of construction wastes in the CFA Landfill will be prepared and submitted to the Agencies. The determination will list the types of material, such as office trash and lunch remains, which will be disposed in the CFA Landfill. No hazardous, radioactive or mixed waste will be sent to the CFA Landfill.
128.	Table 3-1	3-2	Would 'hot spots' within CPP-95 from clearing and grubbing with >23 pCi/g Cs-137, be classified as "unexpected wastes?"	No change to the document. If waste in excess of 23 pCi/g Cs-137 were generated during clearing and grubbing, the form included with the construction waste management plan will be submitted to the Agencies.
129.	Sect 4.1	4-1	Although the word "characterization" is stated, it is unclear what characterization activities beyond the listing of categories provided in Table 3-1 will be made.	Table 3.1 is a "generalized" categorization of wastes expected to be encountered during construction. Industrial waste, e.g., office trash and lunch remains will have no additional characterization required. Visual observations in conjunction with radiological scans during construction activities will be conducted. Any unexpected encounter with abnormal soil conditions or higher than normal radiation counts will be investigated, a waste determination prepared, and the waste segregated and managed appropriately.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix I, SWPPP for SSSTF Constr.				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
130.	Endangered Species	2 of 3	Table 7-11 of the OU 3-13 ROD lists threatened and endangered species within the area. If the 11/24/00 Stoller Corp letter is a short-term ecological risk assessment, it should be included in the RD/RAWP.	The Stoller letter is not a short-term risk assessment, however, it will be provided as an attachment to this Appendix.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix J, DOE/ID-10881

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
131.	General		As commented on previously, the approach used to estimate concentrations of other radionuclides is not provided; a QAPP is needed for continued operations of the ICDF for quality control purposes; no definition is provided on "low safety consequence," the frequency at which waste will be sampled for disposal to supplement process knowledge.	Part of this comment is addressed in the response to EPA comment #39. The definition of "low safety consequence" is provided in DOE-STD-3009-94 and DOE-ID Order 420.D. Clarification of LSC will be made as a footnote in the O&M plan where it is actually referenced..
132.**	Sect. 1	1-1	Refering to the CAMU White Paper which is a DOE and contractor interpretation of the signed OU 3-13 ROD and EPA regulations. Acceptable waste for treatment in the evaporation will be those meeting the waste acceptance criteria and profiles identified in the RD/RAWP and O&M plans submitted to the State and EPA pursuant to the FFA/CO.	DOE's interpretation of the AOC, CAMU, or other policies described in the draft final document were removed.
133.	Sect. 2.1, 5th Bullet	2-1	The section states "Characterize each waste stream by acceptable process knowledge or analytical results described in Section 2.4 and 2.5." The DQO process should be applied to the problem of determining the quality of process knowledge and need for analytical data. For example, if process knowledge is provided then how much analytical data is necessary, if any, to support it or if limited analytical data is available, what level of process knowledge is necessary for characterization? Additionally, the amount of waste that can be sent to the landfill based on process knowledge alone should be limited due to potential error in concentrations of characterization.	No change to document. Issue will be addressed through the WAF process.
134.**	Sect. 2.1	2-1	Although the concept of "generator" may have utility in describing operations, DOE-ID is the generator, transporter and waste management facility operator for purpose of implementing this CERCLA remedial action.	See response to Comment #22. The text was changed from "generator" to "generating site".

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix J, DOE/ID-10881

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
135.	Sect. 2.3, 1st Para	2-2	This section states that the TCLP procedure will be used to determine if waste is adequately stabilized. Since the TCLP procure is based on Atypical@ landfill conditions, shouldn't the parameters, such as acidity and Ph, be adjusted based on the potentially more severe conditions expected in the ICDF landfill? Also, should total metals be evaluated as well, since the TCLP method is so conservative?	No change to document. Most of the available data are total metals. The TCLP testing approach, including UHC's, is the appropriate method for testing stabilized waste. Use of total metals post-stabilization will not demonstrate whether treatment was successful.
136.	Sect. 2.2.1	2-3	The text in this Section begins with the sentence "Some waste types may be encountered that are outside of the appropriate WAC for the individual ICDF Complex unit, but may be acceptable for treatment, storage, or disposal at the ICDF Complex." If the wastes types are outside the WAC how can these wastes also be acceptable for treatment, storage or disposal based on the approval of the ICDF manager. The request process outlined states that "....the ICDF manager will determine whether the exception could be approved by the ICDF management or whether DOE-ID and/or the regulatory Agencies approvals are required." Suggestion: Whenever there may be exceptions made to the WAC requirements during ICDF operations, the Agencies and DOE-ID consultation should be included in discussion of these proposed exceptions as a matter of course.	Section 2.2.1 and subsequent subsections will be deleted. This section will be revised to indicate that significant changes to the WAC will require a modification to the SSSTF RD/CWP.
137.	Sect. 2.2.1.2	2-3	Appendix J, Section 2.2.1.2., Page 2-3. This section should also state that acceptance of waste should not pose criticality risks.	This section was deleted per comment 136.
138.	Sect. 2.4.1	2-5	Appendix J, Section 2.4.1., Page 2-5., Last Paragraph. This section references Aunit-specific acceptance criteria.@ What does this mean?	Text will be revised to "facility" rather than "unit". Facility then refers to the landfill, evaporation pond or the SSSTF.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix J, DOE/ID-10881

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
139.			Appendix J, Section 2.4.3.2., Page 2-7, 4th bullet. In reference to data quality requirements this bulleted item states ACalculations for scaling to determine radiological concentrations of radionuclides that were not analyzed are complete and accurate.@ What are these calculations for scaling? If the author(s) are referencing concentrations of mixture unknowns to one Ain-situ@ gamma emitting nuclide measurement, then are they ensuring that the contaminant mixture is not influenced by environmental factors (i.e. migration, sorption differences, etc.)?	No change to document. The calculations for scaling are presented in the CERCLA Waste Inventory Database report. Generally, Cs-137 was used as the scaling constituent and the distribution of other constituents determined. When analytical data was available, that information was used to determine the constituent concentrations. Use of the additional analytical data is considered to deal with the migration and sorption issues. Please review the CERCLA Waste Inventory Database report and EDF-264 for further information.
140.	Sect. 2.4.3.2	2-6	The first two paragraphs of the section discuss data quality requirements for the generation of waste profiles required for acceptance. The first paragraph states that the data quality has varied over time and that his data can be used to determine whether or not the waste can be accepted at the ICDF. The second paragraph states that "All data required to fill out the Waste Profile must be collected using the quality requirements in the Quality Assurance Plan, DOE-ID 2001e."	The ER program has used EPA's quality approach since inception of the FFA/CO. All sampling conducted referenced these plans. No significant changes in the quality levels or requirements have occurred during the period of FFA/CO implementation. Therefore, all data collected under the FFA/CO is of comparable quality. Data not obtained under the FFA/CO may require evaluation to determine it's quality level for data use.
141.	Sect. 2.4.3.2	2-6	How will DOE-ID evaluate waste data generated prior to the 2001 QA plan and who will determine whether or not the data meets the existing waste data meets the data quality specified in the QA plan. If any of the historic data is acceptable, as stated in the first paragraph, how will it verified that it also meets the criteria specified in the current 2001Quality Assurance Plan?	See response to Comment #140.
142.	Sect. 2.4.3.3	2-7	The calculation of the test statistic should be demonstrated that it was done in the same manner as the waste acceptance criteria (WAC) threashold limit. For example, did the WAC threashold limit also subtract background concentrations?	Text will be deleted. This issue will be addressed through the Waste Approval Form process and the associated WAC. It will be further evaluated during the ICDF Complex RA Work Plan.
143.	Sect. 2.4.3.3	2-7	This section also states that an n statistic will be used if additional sampling is required. Why wouldn't the n statistic be used to begin with in order to determine if sufficient samples have been collected? Please explain.	Text will be deleted. This issue will be addressed through the Waste Approval Form process and the associated WAC. It will be further evaluated during the ICDF Complex RA Work Plan.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix J, DOE/ID-10881

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
144.	Sect. 2.4.3.3	2-7	The t statistic is used in this section and then the z statistic is used to determine n. Why isn't the use of t and z statistics consistent? Please explain.	Text will be deleted. This issue will be addressed through the Waste Approval Form process and the associated WAC. It will be further evaluated during the ICDF Complex RA Work Plan.
145.	Sect. 2.4.3.3	2-7	The t statistic is for use of small numbers of samples collected (<30), and is not as conservative as the z statistic. Why is the t statistic being used as it may bias the sample results low?	Text will be deleted. This issue will be addressed through the Waste Approval Form process and the associated WAC. It will be further evaluated during the ICDF Complex RA Work Plan.
146.	Sect. 2.5.2, 3rd Bullet	2-11	This section indicates that computer modeling may be used for radiological characterization. Please indicate the quality control criteria for waste characterization that would be necessary for computer modeling.	No change to document. These models are standard computer models (such as Excel, Origin, etc.) and have been published and peer reviewed.
147.**	Sect. 2.5.3	2-11	For purpose of calculating risk to groundwater from mobile radionuclides, background contaminant concentrations should be included	This issue needs to be addressed in the ICDF Complex RA Work Plan as it pertains directly to the landfill.
148.	Sect. 5-2	5-1	Appendix J, Section 5.2, Page 5-1. This section lists waste types not accepted by the ICDF complex. Wastes that pose a criticality risk should also be prohibited. A method for inventory of waste should indicate when criticality issues may arise.	Criticality limits are discussed in Section 5.4.3. The waste tracking system will include a mechanism for tracking the Rad inventory as discussed in section 3.3 page 3-7.
149.**	Sect. 5.4.5	5-3	How does acceptance of 500mR/hr @ 1m waste as contact-handled meet ALARA and short-term risk concerns? A 1 min/wk inspection would result in an annual exposure of 433 mrem per container/box?	It is not anticipated that many boxes having high radiation fields will be generated and all boxes and containers will be handled in accordance with ALARA principles to minimize worker exposure. Three items are important to note: 1) the 500 mR/hr waste will be in a solid form, 2) the mini-densepack method for storage will be used to assist in shielding, and 3) Non-INEEL workers will be limited to exposures less than 15 mRem/yr. These mitigation factors will be incorporated into procedure requirement and philosophy in the O&M Plan.
150.**	Fig. 5-1	5-7	As waste may be located at a temporary location prior to movement into the SSSTF, the label should identify when placed at each distinct storage location.	The waste tracking system will track waste within the ICDF complex at all times. This tracking system is electronic and the labels will not be changed as waste is moved throughout the ICDF complex. The tracking system will identify current and previous locations of the waste within the ICDF Complex.

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DOCUMENT TITLE: Appendix J, DOE/ID-10881

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
151.	Sect 6.3.1	6-1	This section states "Waste greater than 500 mR/h may be acceptable, but would be considered special case waste and must follow the procedure outlined in Section 2.2.1." Based on criticality and landfill capacity issues, Aspecial case waste@ should be limited. Please indicate the maximum amount of this waste that will be tolerated.	This section deals with the treatment unit only. Section 2.2.1 has been deleted. No Special Case Waste will be allowed into the facility without modification to the Waste Acceptance Form and Waste Acceptance Criteria. If waste > 500 mrem/hour is received it will trigger shielding or other controls to maintain safety. Sentence two of paragraph one in Section 6.3.1 has been deleted.
152.	Table 6-1	6-1	Prohibited waste should also include waste outside the scope of the inventory, e.g., organics.	Specific waste streams and management approaches will be part of the Waste Approval Form process. Wastes that are outside the limits identified in the Waste Approval Form and Waste Acceptance Criteria will not be allowed in the SSSTF.
153.**	Appendix A	A-3	The identification of ARARs applicable to the CAMU was made at time of ROD signature. The substantive requirements of 40 CFR 264 Section 552, and 40 CFR 264 Subparts K & CC apply to the Evaporative Pond. No other unit is designated as a CAMU under the ROD. Inserting a policy type document in the OU 3-13 remedial design for a CERCLA remedial action is inappropriate. DOE's interpretation of EPA's regulations and policy concerning CAMU's is prresumptious. Suggestion: Delete the CAMU "White Paper" or retitle it as "DOE's Opinions concerning the Operation of the CAMU" Provide a definition of what "...other aqueous wastes generated as a result of operating the ICDF complex" means in Section 4, or another suitable section of the document.	See response to comment 132.
154.	Appendix E	E-3	What is the purpose of the "Waste Certification Form" as DOE-ID is responsible for all remedial action activities associated with excavation, transport, waste acceptance, treatment, storage and disposal of wastes for management at the ICDF complex?	This form is duplicative and will be removed from the document.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix K, DOE/ID-10859 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
155.**	Sect. 3, 4th Para	3-1	All substantive TPR's need to be included in the Operations plan. In the case of conflicts, the Operations Plan would control.	No change to the document. The O&M plan will contain a list of all identified TPRs with requirements and operating philosophy.
156.**	Figure 3-1 A-3	3-2	The generator, so-called, would send an updated waste profile to the ICDF complex. Substantive changes from the Agencies' approved RD/RAWP would be treated as a modification of a primary document under the FFA/CO	No change to the document. During the Jan. 10th conference call, it was clarified that the waste profile referred to in the comment is the Waste Approval Form. Substantive changes to the waste will result in a revision to the Waste Approval Form as a modification to the FFA/CO primary document.
157.**	Figure 3-1 A-9	3-2	As it is possible that 'hot spots' or anomolies may be detected during retrieval, the generator, so-called, may need include additional waste profiles, not expand the existing waste profile.	This issue is addressed through the Waste Approval Form process described in Appendix S.
158.	Figure 3-1 A-10, A-15	3-2	Substantive changes from the Agencies' approved RD/RAWP would be treated as a modification of a primary document under the FFA/CO	Comment accepted. No change to the document required.
159.**	Figure 3-1 A-14	3-2	As INEEL is the actual generator and owner/operator of the ICDF complex, wastes staged at the ICDF complex which fail acceptance would undergo characterization at the ICDF complex to determine final disposition.	The characterization may be done at the ICDF complex, but the generating WAG would be responsible for this characterization within the INEEL management system.
160.**	Figure 3-2 B-3	3-3	It is lso important to determine if the waste contains "free liquids" as these may be decanted off or sorbed for separate management	No free liquids to the landfill is a ROD requirement. An initial visual survey will be performed outside the truck for the presence of liquids once the truck is inside the ICDF Complex. This issue will be addressed as part of the requirements under the O&M plan.
161.**	B-14	3-3	Prior to repackaging for off-site disposal, waste characterization for management under the Off-Site rule is required.	No change to document. Any shipment of waste outside the INEEL boundaries must meet the requirements of the Off-site rule.
162.**	Sect 3.1 & 3.2	3-5 & 3.6	These sections should be madre consistent with the logic diagrams and our comments contained herein.	The sections will be made consistent with the resolutions.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix K, DOE/ID-10859 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
163.**	Figure 3.3 C-2	3-7	The process for waste inspection needs to be fully described as this is an important part of the acceptance criteria. The responsibility for waste examination, to include QA sampling, is the ICDF complex's, not the generator, so-called. Suggestion: If the waste examination and QA sampling occurs at the exacvation sites, this procedure needs to be described here.	Based on clarification during Agency conference calls, it is understood that this is comment deals with 1) waste verification at the source and 2) uncertainty of site characterization is a QA function. Procedures for the two parts of this comment will be included in Waste Approval Form process.
164.	Figure 3-4 G-2	3-9	The Tracking system information should be maintained by ICDF Complex personnel to avoid errors	The tracking system will limit the ability to input information in the tracking system to qualified personnel independent of the generating site.
165.	Figure 3-4 G-8	3-9	It is possible that the waste may reside at different locations within the ICDF complex and this potential should be addressed.	No change to the document. It is possible that a waste container may be moved to several locations after it enters the SSSTF. Each time a container is moved, a "process task" is executed in the waste tracking system to document the action. Examples of a "process task" would include movement from a storage pad into the decontamination building, treatment processing, disposal in the ICDF landfill, or shipment to an off-site TSD. This issue will be addressed as a requirement under the O&M plan.
166.	Figure 3-5 E-2	3-13	How will mixed loads of debris and waste be addressed?	The majority of the waste to be sent to the ICDF Complex will be soil material. To the extent possible waste will be separated from debris at the generating site. If the box meets the definition of debris i.e. "A mixture of debris that has not been treated to the standards provided by 268.45 and other material is subject to regulation as debris if the mixture is comprised primarily of debris, by volume, based on a visual inspection. A procedure for the separation of the materials will be addressed in O&M the plan.
167.	Figure 3-5 E-3	3-13	In ordeer to successfully grout debris wastes, there must be sufficient void space available. An inspection to determine % voids should be made at this step.	Box(s) which have been identified as having questionable void space (grout that cannot flow throughout the container) will be an anomaly(s) and the requirements for ensuring they meet the performance specification will be identified in O&M 2.
168.	Figure 3-7 J-5	3-17	The limitations of ICDF management approval need to be clearly defined	Special Case Waste has been eliminated from the O&M Plan.

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DOCUMENT TITLE: Appendix K, DOE/ID-10859 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
169.**	Sect 5	5-1	Although it is understandable that detailed maintenance plans are not available at this time, reference to the submittal of a detailed O&M Plan after completion of construction and shakedown should be provided here.	A reference shall be added to the O&M plan. On page 5-2 at the end of the discussion, a sentence will be added that says " Further procedural requirements and operational philosophy will be outlined in the O&M plan."
170.**	Sect 7	7-1	The roles and responsibilities of IDEQ and EPA is established under the terms of the FFA/CO and are in no way modified by DOE-ID's unilateral assertions in this section.	The responsibilities section for the agencies shall be deleted from Section 7.
171.**	Appendix C & D	C-5 & D-5	No information on what corrections were made is given and should be Suggestion: A reference to a work order or equivalent may be sufficient	A column entitled " Deficiency Resolution Documentation" shall be added to the referenced resolution tables.
172.**	Appendices	General	No inspection checklist is provided for equipment and structures inspections and should be.	The requirements and sample forms for the inspection checklists will be included in the O&M plan and included in the subsequent TPRs.

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DOCUMENT TITLE: Appendix L				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
173.			Document deleted - no comments	

DOCUMENT TITLE: Appendix M, DOE/ID-10886 (This document and associated resolutions will be part of the ICDF RA WP)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
174.**	Table 3-1	3-2	Although industrial waste may not need to be disposed of in the ICDF, the CFA landfill is not a CERCLA-facility. A suitability determination is required to insure that disposal at this site does not constitute an unacceptable threat to health or the environment.	See response to comment 127.
175.**	Appendix A	A-3	The Waste Profile form is only summary level information and contains even less information than the waste approval form in Appendix S.	The Waste Approval Form, which is the form reviewed by the Agencies, should have the necessary information.
176.**	Appendix B	B-3	ARARs are established in the ROD. DOE Orders are TBC's not ARARS. Also, 40 CFR 761.50(b)(7) is also an ARAR and applies to PCB storage.	40 CFR 761.50(b)(7) will be added to the ARAR's list. The title of Appendix B will be changed to also include TBC's.

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DOCUMENT TITLE: Appendix N, Pln-873 (This document is now Appendix K of the SSSTF RD/CWP)				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
177.	General		Many comments (Such as Appendix N, Item 20, 22, 23; Appendix R, Items 33, 36, 38) were previously submitted for Appendix N-Quality Program Plan (QPP) and Appendix R Sampling and Analysis Plan (SAP). These comments addressed the fact that there was a lack of adequate description of project quality control procedures that will be applied to the environmental data collection to assure that the results obtained are of the type and quality needed for a specific decision or use. Our comments were based on information lacking from the QPP and SAP such as frequency of quality control sample collection, waste management, Standard Operating Procedures (SOP's), specification of analytical methods, how samples will be preserved, precision goals, data validation, etc. Suggestion: The DOE-ID's response to EPA's comments was to state that this information was included in the *Quality Assurance Project Plan for Waste Area Group 1, 2, 3, 4, 5, 6, 7, 10, and Inactive Sites (DOE-ID 2000).* If the requested information is not included in the Appendix N QPP or Appendix R SAP and is included in another document, then it should be referenced in the draft final document.	No change to the document. The requested information is available in the *Quality Assurance Project Plan for Waste Area Group 1, 2, 3, 4, 5, 6, 7, 10, and Inactive Sites* (DOE/ID-10587).

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix O, Sched & Assumptions (This document is now Appendix L of the SSSTF RD/CWP)				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
178.**	General		The section needs to include "Identification and schedules for the preparation of other design elements..." In addition, the RD/RAWP must includea "Revised detailed schedule through RA, including construction inspection hold points and taregeted schedules for primary and secondary documents," and "performance measurement points." What is provided is an extremely high level summary schedule, which is insufficient. Suggestion: Please note that citations are from the FFA/CO and the INEEL RD/RA Guidance	The schedule will be revised to provide an adequate level of detail. Additional assumptions and scope statements will be added to clarify individual line items in the schedule. Other agency deliverables will be identified on the schedule.

DOCUMENT TITLE: Appendix P, Cost Estimate (This document is now Appendix M of the SSSTF RD/CWP)				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
179.	3rd Bullet	P-4	It is inconsistent to assume that no contaminated material will be encountered during construction as the site is located within CPP-95.	The assumption was included to highlight the fact that funding for significant unknowns was not covered in the estimate. Based on the early excavation activities at the ICDF, approximately 30 yards of contaminated soil (below the RAO's) was identified and stockpiled for reuse.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix Q, DOE/ID-10903 (This document and associated resolutions will be part of the ICDF RA WP)				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
180.	Sect 1.5	1-3	This treatability Study appears inconsistent with the discussion on MBS in Appendix B-!?	No change to the text. The MBS discussion was removed from the main text in Appendix B-1.
181.**	Table 1-2	1-4	By limiting the treatability study performance criteria to the expected limitations in the to-be-treated waste streams, this further increases the need to QA these waste streams either prior to treatment or post-treatment to insure that constituents not evaluated are not present at unacceptable levels	No change to the document. These are the target metals for stabilization, but all treated waste streams will be evaluated per the SAP following treatment in Appendix R. If vendor information is available, it may be provided to aid in the understanding of the treatment capabilities. This information may also be used to expand the capabilities of the treatment unit, which would require a modification to the ICDF Complex RA Work Plan.

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DOCUMENT TITLE: Appendix R, DOE/ID-10924 (This document and associated resolutions will be part of the ICDF RA WP)				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
182.	General		The Sampling and Analysis Plan appears to lack a basis for determining how many samples to collect in order to determine if stabilization of waste was successful. The number of actual samples that are collected for a specific treatment campaign (stabilization of waste) needs to be based on quantified decision error limits. Section 2.6, Decision Error Limits, located on page 2-5 does not provide decision error limits. Without specific decision error limits, one can not determine if sufficient samples will be collected.	No change to the document. The sampling scheme and number of samples for post treatment confirmation is identified in this document. As stated, the decision error limits is a pass/fail based on TCLP results. Representativeness and sample source will be further described in the O&M plan..
183.	General		Once decision error limits are determined and agreed upon by DOE-ID and the agencies, an acceptable standard sampling approach must be used for each source of waste soil.	See response to Comment #182.
184-186			[No items provided from EPA for these numbers]	
187.	General		In various sections of the text, it states that background samples, which may contain uranium, will be subtracted from the total concentration for characterization of wastes that may be accepted into the landfill. For example, in Section 2.5.3., on page 2-11. Based on risk, subtracting background samples is not acceptable. An observed release is based on a sample concentration exceeding three times the background concentration for metals only. Please explain why background samples would be subtracted, since they may be representing background, but instead, widespread contamination. Additionally, the text does not explain where specifically these background samples come from.	No change to the document. Background concentrations have been identified in the OU 3-13 ROD. These concentrations truly represent background and not widespread contamination. This issue needs to be addressed for the ICDF Landfill, which is described in the ICDF RD/CWP.
188.	Sect. 2.7.1	2-5	This section states that a single representative grab sample will be collected and analyzed for UTS metals constituents using TCLP for each treatability study. Since one grab sample may represent a large amount of treated waste, what is the decision error associated with collecting only one sample, and is it acceptable based on waste acceptance criteria. Please explain.	No change to the document. The treatability study will use a sample that represents the high-end concentration of contaminants in the waste being treated to assist in determining the treatment recipe. The actual testing of the waste will be performed following treatment as pass/fail criteria. If the treatment fails based on the treated waste sample, additional treatment, testing, or disposal will be necessary.

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DOCUMENT TITLE: Appendix S, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
189.	Sect 2.1, 1st Para	3	According to the text the analytical data "....will be supplied by the generator and forwarded to the ICDF for approval and designation of waste verification level." The forms proposed (pgs A-5, and A-6) for waste approval do not specify the level of analytical quality that must be supplied with each waste stream.	This subject was the topic of numerous agency calls. Resolution of the comment was achieved through modification of the WAF, instructions, and associated flowchart. This process more clearly defines the information provided by the generator, the waste verification and QA requirements, and Agency involvement.
190.**	Sect 2.1, 1st Para	3	The QA/QC criteria requirements are not specified on the forms that include field gas chromatography, field XRF, and portable Gamma Spectroscopy. The quality of these data must be verified with an acceptable percentage of analytical results to insure that the WAC will be met. Field screening data such as PID(which may be conducted more for site safety monitoring that any analytical purpose), Field Test Kits and "visual examination" are identified as Tier 1 data on the forms. These techniques are generally used as screening techniques and do not provide definitive quantitative analytical results. The proposed forms would allow the submission of any of these data for waste verification and acceptance at the ICDF, while the reliability of the data may or may not meet QA/QC criteria specified in the Sampling and Analysis Plan for the SSSTF.	See response to Comment #189. The specifics on field and QA techniques will be included in the O&M plan.
191.**	Figure 2-1	4	The primary document modification process is adequately described in the FFA/CO and this figure cannot preempt this process	DOE concurs that any modification to the RD/RA Work Plan will be in accordance with the FFA/CO.
192.	Appendix A #3	A-5	It should be clarified that the removal action should also be in accordance with CERCLA and applicable sections of the NCP, i.e., agency & public input for non-time criticals.	See response to Comment #189.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - EPA

DOCUMENT TITLE: Appendix S, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
193.	Appendix A General	A-3	A) An instruction should be added that requires waste streams to be divided if process information &/or sampling/analysis supports a variation in waste characteristics. B) An instruction should be added to include a description of any teltale characteristics of the waste that may be of assistance in verification, e.g, soil pH, color, grain size, etc. Suggestion: For example, soils near a fill pipe may have characteristically different COC levels that soils further away. "Halo" soils near excavated waste containers/tanks may also be different.	See response to Comment #189.
194.**	Appendix A #8	A-5	A) Appropriate references used by the WAG Manager should be provided and submitted, if not part of the Administrative Record. B) The Name should be printed and signed	See response to Comment #189.
195.**	Appendix A #10	A-6	A) There should be 2 types of waste verification inspection/sampling, one dependent upon potential threat as described on the form and a second based on random sampling. Suggestion: As an example, 10% of all incoming wastes loads could be subjected to the next higher tier waste verification	See response to Comment #189.
196.**	Appendix A #11	A-6	The Name should be printed and signed	See response to Comment #189.
197.	Appendix A General	A-6	An item should be added providing an indication of the WAG Manager's confidence in the information provided Suggestion: For example, if confidence is low, a higher level of waste verification would be required.	See response to Comment #189.

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DOCUMENT TITLE: Appendix S, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
198.**	Appendix B Site General	B-4	A) The above comments concerning the deficiencies in the form apply to all the waste approvals provided and is not repeated further. B) The relationship between the analytical value table and Item #5 is unclear for all waste streams Suggestion: For example, if "expected" means a 95% UCL then this should be stated C) The units for radionuclides are listed as mg/kg in the analytical tables supporting each site D) In Item #9, the determinations of whether LDR applies are not are probably inaccurate as the determination cannot be made 'a priori' as it is dependent upon site-specific management activities. As a result, this information is rejected in all cases. E) The basis for the WAC concentrations is unknown as the ICDF landfill & Evaporation Pond WAC's are not final Suggestion: For example, the values given for organics exceed the LDR value for TCE?	A) See response to Comment #189. B) The analytical values provided in the table for each site are either the 95% UCL (8 or more samples exceeding detection limits) or maximum (less than 8 samples exceeding detection limits). This information is provided in EDF-ER-264. C) The attachment to the forms has been revised and the units are correctly identified in pCi/gm. D) See response to Comment #189. E) See response to Comment #189.
199.**	Appendix B Site ARA-01	B-6	A) It is not clear what the source of the table with "expected concentrations" is, given the concentrations provided for arsenic, selenium & thallium which in Item #5? B) The "Inorganics" in #6 is not checked which is inconsistent with Item #5.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
200.	Appendix B Site ARA-12	B-8	A) VOCs & SVOCs are checked in Item #6 in agreement with the analytical table, but not with the narrative. This discrepancy needs clarification?	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

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DOCUMENT TITLE: Appendix S, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
201.	Appendix B Site ARA-23	B-13	A) It is not clear what the source of the table with "expected concentrations" is, given the average exposure point concentration given for Cs-137 in Item #5?	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
202.	Appendix B Site CFA-04	B-18	The information provided is vague and could result in any waste stream being accepted. Item #10 needs to focus on COCs and distinguishing contaminants. Suggestion: A gold-film mercury detector could be used to check on mercury levels as a Tier I verication measure	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
203.**	Appendix B Site CPP-01/04/05	B-23	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
204.**	Appendix B Site CPP-03	B-28	This site appears to be separable into more specific waste streams as to source and waste type and should be.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
205.	Appendix B Site CPP-08/09	B-33	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
206.	Appendix B Site CPP-10	B-38	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
207.	Appendix B Site CPP-11	B-43	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
208.	Appendix B Site CPP-14	B-48	The information provided concerning contaminants other than Cs-137 is vague and could result in any waste stream being accepted. Item #10 needs to focus on COCs and distinguishing contaminants.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
209.	Appendix B Site CPP-19	B-53	No additional cooment	Noted.
210.	Appendix B Site CPP-34	B-58	No additional comment	Noted.
211.	Appendix B Site CPP-35	B-63	Given the potential source and the small volume, the Tier should be increased one level for both inorganics and radionuclides for this waste	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
212.	Appendix B Site CPP-36/91	B-68	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes. Suggestion: For the potential mercury COC, a gold-film mercury detector could be used to check on mercury levels as a Tier I verication measure	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
213.	Appendix B Site CPP-37a	B-73	The information provided concerning contaminants is vague and could result in any waste stream being accepted. Item #10 needs to focus on COCs and distinguishing contaminants. COCs appear to be at a low confidence which justifies a higher verification level than Tier 1.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
214.**	Appendix B Site CPP-37b	B-78	Given the high uncertainty as to the potential COCs present more characterization is necessary to properly identify this source and divide it into appropriate categories, e.g., debris, VOC, Inorganics, radionuclide, etc.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
215.	Appendix B Site CPP-44	B-83	No additional comment	Noted.
216.	Appendix B Site CPP-48	B-88	This may be a good candidate for REDOX & pH to support waste verification	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
217.	Appendix B Site CPP-55	B-92	Given the paint solvents a Tier 2 VOC appears necessary for this site Suggestion: For the potential mercury COC, a gold-film mercury detector could be used to check on mercury levels as a Tier I verication measure	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
218.	Appendix B Site CPP-67	B-98	Given the high uncertainty as to the potential COCs as presented, more characterization is necessary (after taken out of service) to properly identify this source and divide it into appropriate categories, e.g., debris, VOC, Inorganics, radionuclide, etc.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
219.	Appendix B Site CPP-69	B-103	The SFE-20 tank contents include Pu-239 at significant levels. The soil needs to be characterized after tank removal given the high uncertainty.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
220.	Appendix B Site CPP-83	B-108	Group 4 wastes should be distinguishable by location Suggestion: For example, Perched water directly beneath the tank farm may need to be managed separately from perched water outside the INTEC fenceline.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
221.	Appendix B Site CPP-88	B-111	The wastes should be separated for different waste types, e.g., debris should be separated from contaminated soils, from secondary waste (e.g., PPE)	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
222.	Appendix B Site CPP-92	B-114	The wastes should be separated for different waste types, e.g., debris should be separated from contaminated soils, from secondary waste (e.g., PPE)	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
223.	Appendix B Site CPP-93	B-119	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
224.	Appendix B Site CPP-95	B-124	The wastes should be separated for different waste types, e.g., debris should be separated from contaminated soils, from secondary waste (e.g., PPE)	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
225.**	Appendix B Site Tank Farm Soils	B-127	This is far to overarching. The wastes should be separated for different waste types and sources and Item #10 completed on each.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
226.	Appendix B Site CPP-97	B-132	A) Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes. B) Given the source of the soils, a higher tier for radionuclides appears necessary.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
227.	Appendix B Site CPP-98	B-137	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
228.	Appendix B Site CPP-99	B-142	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
229.	Appendix B Site Op Wastes	B-147	This is far to overarching. The wastes should be separated for different waste types and sources and Item #10 completed on each	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
230.	Appendix B Site Group 5	B-150	The wastes should be separated for different waste types, e.g., groundwater, drill cuttings, PPE, etc.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
231.	Appendix B Site CPP-13	B-153	No additional comments	Noted.
232.	Appendix B Site TSF-06	B-158	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
233.	Appendix B Site TSF-09/18 Liquids	B-162	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

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Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
234.	Appendix B Site TSF-09/18 soil & debris	B-167	A) Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes. B) This is far to overarching. The wastes should be separated for different waste types and sources and Item #10 completed on each	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.
235.	Appendix B Site TSF-26	B-172	Item #5 does not indicate the maximum COC concentration expected and needs to for WAC purposes.	The site-specific Waste Approval Forms have been deleted from the document and will be resubmitted to the Agencies as part of the ICDF Complex RA Work Plan. The timeframe for submitting the site-specific forms will be identified on the schedule included in the SSSTF RD/CWP.

Comment Response Tables

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
1.	Response to Comment 1(a)	--	The response to the comment states that *". . . For BBWI documents, an "attachment" is not an integral part of the document, i.e., it may be revised without requiring a change in the main document. . ."* The purpose of including this statement in our comment response, or for including the following statement throughout the appendices is unclear: *"This is a stand alone document provided with the original deliverable. It may be revised separately from the Remedial Design/Remedial Action Work Plan for the Waste Area Group 3 Staging, Storage, Sizing, and Treatment Facility."* As stated in the original comment, each portion of the submittal (including all appendices and/or attachments) is considered part of the RD/RA Work Plan Primary document, and is subject to all processes outlined in the FFA/CO regarding primary documents. That is, any desired/proposed changes to an appendix or attachment in the SSSTF Submittal package will be evaluated by the Agencies as a request for modification of the primary document (i.e., the SSSTF RD/RA WP) pursuant to the FFA/CO Part J, Section VIII, Paragraph 8.22.	No change to the document. Agree with comment, all parts of the document (appendices and attachments) are considered part of the RD/RA Work Plan, a FFA/CO primary document.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
2.	Response to Comment 2	--	The second paragraph of the response to our comment states "Once the RD/RA work plan has been approved, the SSA will operate under the SSSTF requirements. The SSA WMP will not remain in effect, and associated procedures and technical guidance will be assimilated into SSSTF's documentation prior to pre-final inspection." If it is DOE's desire that the SSSTF RD/RA WP supersede the SSA WMP when the former is finalized, then all procedures/guidance necessary to operate the SSA must be included in the SSSTF RD/RA WP. DEQ is not aware of any FFA/CO process to "assimilate" this material into SSSTF's documentation prior to pre-final inspection other than through formal modification of a primary document pursuant to the FFA/CO Part J, Section VIII, Paragraph 8.22. Wastes are currently stored in the SSA. Therefore, there can be no lapse of procedural requirements originally identified in the SSA WMP. However, since the requirements/procedures/technical guidances in question are already written and presented in the SSA WMP, there is no need to delay their identification and incorporation into the SSSTF RD/RA WP prior to document finalization. Identify which portions of the SSA WMP will be incorporated into the SSSTF RD/RA WP.	The operational requirements and philosophy for the SSA will be included as an Appendix to the O&M Plan. If changes to the operational requirements and philosophy are required for operation of the SSA, those changes will require a modification to the ICDF Complex RA Work Plan in accordance with the FFA/CO.
3.	Response to Comment 4	--	The NESHAP modeling/compliance demonstration was removed from this document and placed in the ICDF 60% document, however DOE did not adequately address DEQ comment 97 of the ICDF Design review. The response to comment 4 is therefore inadequate.	No change to the document. As identified in the response, the NESHAPs modeling for the SSSTF and the ICDF complex has been performed and is included as part of the ICDF RD/RA Work Plan (currently under review). Further evaluation is being performed to determine the NESHAP's impact from the ICDF Landfill and Evaporation Pond WAC and will be addressed as part of the ICDF Complex RA Work Plan. The NESHAP's modeling using the anticipated waste inventory determined that the NESHAPs requirements (10 mREM/yr to the MEI) will be met. As this was the modeled dose at the nearest site boundary, the NCP requirement will also be met.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
4.	Response to Comment 14	--	Response does not address proper management of liners as site-generated debris that must be treated by a debris treatment technology. The empty container does not require treatment and can be directly landfilled, but not the liner. The Operations Waste Management Plan in Appendix M does not indicate a procedure.	40 CFR 261.7 states that " Any hazardous waste remaining in either (i) an empty container or (ii) an inner liner removed from an empty container, as defined in paragraph (b) of this section, is not subject to regulation under parts 261 through 265, or Part 268, 270 and 124 of this chapter or to the notification requirements of section 3010 of RCRA." Therefore the liner can be directly disposed in the landfill.
5.	Response to Comment 17b	--	The 1996 Uniform Plumbing Code is still referenced, instead of the current 2000 edition. Please reference the current 2000 edition.	The text was changed in Section 2.3, page 2-17 to reference UPC 2000.
6.	Response to Comment 17c	--	Some applicable standards are still not referenced, such as the Idaho Rules for Public Drinking Water Standards, the 1977 Recommended Standards for Water Works, and the 1977 Recommended Standards for Wastewater Facilities. Please include these references.	The text was revised in Section 2.3, page 2-18 to include the following standards: Idaho Rules for Public Drinking Water Standards, 1997 Recommended Standards for Water Works, and the 1997 Recommended Standards for Wastewater Facilities.
7.	Response to Comment 27	--	The response to this comment requires clarification. The DEQ comment proposes that a 6 to 8 inch lift of selected compacted fill should be placed under the geotextile/HDPE liner, free of sharp or otherwise deleterious material. The change made to the document simply states that "....preparing the subgrade to provide a good foundation with no sharp or protruding rocks evident". Please explain why this subgrade should not be compacted. Specification 02200, page 5 of 7, states that 6 inches of clean concrete sand will be placed and compacted under the decontamination pad floor slab. Since the subgrade under this 6 inch lift is not currently required to be of quality compacted material, little assurance against settlement, or for proper support of the pad, is provided for.	Specification 02200was reviewed during the 1/23/02 conference call and determined to be confusing. The specification will be clarified to include the compaction requirements under the decontamination pad floor. See page 5 of 7.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
8.	Response to Comment 35	--	The reference is to the addition of language in Appendix Q. This language is only mentioned in a bullet item in Section 3.1 page 3.1 and the remainder of the Appendix Q does not reference any thing about the dilution factor. Section 3.3.7 on page 3.7 " Test Plan Strategy " should have additional language outlining the evaluation of the dilution effect.	DOE recognizes that dilution is not an acceptable form of treatment. The treatability study will determine the appropriate amounts of reagents to use to effectively treat the contaminants. The dilution effects will be evaluated as part of the treatability study and subsequent treatment. The following paragraph will be added to the end of Section 3.3.7 of the Treatability Study Test Plan: "A determination to show that dilution is not the controlling factor will be conducted on those treatability studies where the waste loading is less than or equal to 50% of the treated waste. The treatability study will demonstrate that "dilution through treatment" of hazardous constituents will either remove or immobilize those constituents to satisfy the fundamental statutory requirements."
9.	Response to Comment 36	--	The original comments posed questions regarding the mixer unit design. The responses referred to the minimum procurement features identified in Section 5.2 of the SSSTF procurement specifications (Appendix B-1). This information is far less detailed than what should be found in a 90 + percent Remedial Design, which is what this draft final Remedial Design/Remedial Action Work Plan should represent. Because the design for the mixer unit has not yet been determined, IDEQ cannot evaluate the efficacy of this critical system component, or whether the unit will likely be capable of meeting the design specifications with minimal long-term maintenance requirements. It appears to be the DOE's intention to finalize this RD/RA Work Plan as-is, with the mixer design incomplete. If so, a clearly-defined process should be developed to allow DEQ an adequate review period of the selected treatment equipment drawings, operational procedures, including quality control procedures following procurement and prior to the pre-final inspection.	The schedule for review of the design of the mixer unit is revised and is presented in the SSSTF RD/CWP Schedule in Appendix L. This review cycle is presented as a modification to a final FFA/CO Primary, (i.e., 30 days to identify disputable items). If possible, an information package of the vendor supplied design drawings will be provided to the Agencies prior to the 30 day review cycle to assist in their review.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
10.	Response to Comment 37	--	The response misses the issue. If a waste is not debris to start with (soil with less than 50% debris) it must be treated to a "treatment standard". If a facility takes a piece of material out of a waste that is not originally debris, that material must still be treated to the treatment standard. Even if the material is > 2" it can not be considered debris and treated as such. Therefore, the SSSTF must handle the large material removed in a way to meet the treatment standard (size reduction).	The definition of soil in 40 CFR 268.2 is: "unconsolidated earth material composing the superficial geologic strata (material overlying bedrock), consisting of clay, silt, sand or gravel size particles as classified by the U.S. Natural Resources Conservation Services, or a mixture of such materials with liquids, sludges, or solids which is inseparable by mechanical removal process and is made up primarily of soil by volume based on a visual inspection." Treatment is defined in 40 CFR 260.10 as "any method, technique, or process including neutralization, designed to change the physical, chemical or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous or less hazardous; safer to transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume." Debris is defined as a solid material exceeding 60 mm particle size that is intended for disposal that is: A manufactured object; plant or animal matter; or natural geologic material. However, the following materials are not debris: Any material for which a specific treatment standard is provided in Subpart D, part 268, namely acid batterics, cadmium batteries, and radioactive lead solids; Process residuals such as smelter slag, and residuals from the treatment of waste, wastewater sludges, or air emission residuals; and Intact containers of hazardous waste that are not ruptured and that retain at least 75 % of their original volume. A mixture of debris that has not been treated to the standards provided by 268.45 and other material is subject to regulation as debris if the mixture is comprised primarily of debris, by volume, based on a visual inspection." Screening of material to large for the treatment unit is treatment and once this waste is segregated, if it meets the definition of debris, it will be treated as debris.

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11.	Response to Comment 39	--	The response appears to indicate that the requested information is found in the O&M Plan (Appendix K). However, it does not appear to be included. Please clarify.	The text will be revised in the O&M plan (to be submitted in the ICDF Complex RA WP) to state that treated waste containers may be placed on an outside storage pad or in the decontamination facility, as space allows, for curing. The text will also be revised to indicate that all the treatment will be performed inside the decontamination facility.
12.	Responses to Comments 48, 49, and 50	--	These comments have not been addressed. It was DEQs understanding from the November 13-14, 2001 Agency meetings, that these comments would be temporarily resolved for purposes of the SSSTF RD/RA Work Plan by removing Sub-Appendix A from the document. While removing the sub-appendix from this document will not resolve the issues, it would effectively defer the resolution of these comments to the later Group 3 soils RD/RA Work Plan. However, sub-appendix A is still present in the draft final RD/RA Work Plan, with only the minor change of deleting footnote A which identified that there is uncertainty regarding the identification of certain boxes because their barcodes have worn off. If this sub-appendix is going to remain in this document, then the concerns DEQ identified in draft comments 48, 49, and 50 must be addressed now. DEQ cannot concur, for example, with a document indicating use of the debris treatment standard for boxes that have contents identified as only "soil."	Sub-Appendix A to Appendix B-2, Debris Treatment, will be removed including all references to this appendix in the text. This issue will be resolved during the Group 3 RD/RA Work Plan.
13.	Response to Comment 53b	--	The response to this comment addresses the Uniform Plumbing Code, not the AWWA. Please provide documentation that the existing three-inch fiberglass water line meets AWWA standards (C-950-81).	The project files from the installation of this FRP line were located. The pipe was installed in the fall of 1989 and was supplied by Intermountain Piping Systems (IPS). A letter of certification was found certifying the FRP pipe carries the National Sanitation foundation STD No. 14 stamp of approval and was tested and certified to meet American Water Works Association standard C-950 (see attached). All pertinent project documentation including specifications, construction test reports, etc, was recovered and can be supplied upon request.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
14.	Response to Comment 55	--	The response to this comment states that the process may need to be shut down in the event of a loss of power to the ventilation system. This does not address the concern raised in the original comment. A loss of containment could occur due to a loss of power to the ventilation system as a result of the loss of negative pressure. A backup source of power, such as the mentioned small generator, seems to be prudent for this application.	No change to the document. The entire process would be shutdown in the event of a loss of electrical power as there is no requirement for standby power. When facility doors are opened, no negative pressure will be maintained. The minimum treatment unit will have a HEPA-filtered exhaust system separate from the facility systems. It is anticipated that the treatment unit would be fully enclosed and have a filtered inlet and damper to prevent the back flow of air should the exhaust system fail. A failure of the facility exhaust systems would not impact the process unit. The combination of filters and a damper would provide containment in the case of a treatment unit exhaust system failure
15.	Response to Comment 63	--	The variance mentioned in the response to this comment has not been fully incorporated into the DOE-ID Architectural Engineering Standards. Please incorporate this document to meet the conditions set forth in the variance.	The waiver will not be used in this design. The potable water line will be installed per the IDAPA regulations. In the locations where the waiver was originally intended to be used, the potable water line will be placed a minimum horizontal distance of 10 feet away from the non-potable lines or sleeved with sealed endcaps and placed a minimum horizontal distance of 6 feet away from the non-potable water lines. This was discussed and approved by IDEQ, Dick Rogers, on a telephone call on March 7, 2002. See Drawings U-3, U-6, U-13 and U-14. In regards to the SSSTF connection to the INTEC Sewage Treatment Plant (STP) discussed up in IDEQ's Comment #51 (b) to the draft Work Plan, there was an exceedance of the Total Nitrogen in the January 2002 effluent sampling/analysis from the STP. This information was presented to the IDEQ during a meeting on March 5, 2002, in the Idaho Falls Office. William Teuscher from the IDEQ Idaho Falls Regional Office is aware of the nitrogen problems at the INTEC STP. He has been assisting BBWI personnel in identifying other alternatives for reducing the nitrogen levels at the INTEC STP. Many of these alternatives were presented in a letter from Mr. Teuscher to Ron Guymon (BBWI) dated February 11, 2002. The IDEQ agreed to allow the SSSTF connection to the INTEC STP because a good faith effort has been and will continue to be made between the DEQ Idaho Falls Regional Office and BBWI to reduce the Total Nitrogen concentration in the STP effluent.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
16.	Response to Comment 80	--	Please explain what is included in the "detailed inspection plan," and when will it be developed.	No change to the document. Detailed inspection plans will identify the specific civil, mechanical, electrical, etc. inspections and acceptance criteria needed to verify the SSSTF is installed in accordance with the specifications and drawings. BBWI internal inspection procedures MCP-2482 and MCP-2490 will be used to develop the inspection plans. The plans are developed using the design specifications and drawings. The results of the inspections will be documented and documents will be available during on-site visits. Ultimately, the inspection documents will become part of the project file and designated as Quality Assurance records.
17.	Response to Comment 85	--	The response states, " . . . the exact report form has not been determined. All the information required for entrance into the ICDF complex is on this form. The reporting format may change." The response is unclear. DEQ will not approve draft or preliminary forms which are subject to change by DOE either in form or substance. Since these are new forms which have been added to the document since the draft, agreement must be reached on the both the form and content before the Agencies will approve. Verification of the minimal information that has been provided to date will take more than the 15 days provided for review of a draft final document. We recommend that the form and information to be included for agency review be agreed upon as part of the RD/RA Work Plan and that a reasonable schedule also be agreed upon for the submittal of the form for Agency approval.	The information required to fill out the Waste Profile, i.e. the content, will remain the same, however the reporting format may change based on the selection of the tracking system. Approval of the example sheets is approving the content of the sheet. The actual report form may in fact look differently. The Waste Approval Form (described in the ICDF Complex Approved Waste Streams), not the Waste Profile, is the form that will be used by the agencies to approve the waste streams and identified verification and QA requirements. The revised form and instructions based on agency discussions are included as an attachment.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
18.	Response to Comment 90	--	The deletion of Section 1.5.4 does not resolve the comment concerns. Notification should be made to the agencies for any unexpected waste found during construction, waste that differs significantly from its profile, waste failing its respective WAC, and waste failing a treatability study, microencapsulation or stabilization process.	(1) Unexpected waste encountered during construction is addressed in the Construction WMP and includes Agency notification. Agency notification will also be provided in the weekly construction reports. (2) Waste that differs significantly from the Waste Approval Form will require a revision to the Waste Approval Form, which is part of a FFA/CO primary document. This will be discussed in the ICDF Complex Approved Waste Streams. (3) Agency notification will be included in the text for waste failing the respective WAC and failing a treatability study, microencapsulation, or stabilization process.
19.	Response to Comment 94	--	Comment not accepted. Any exceptions to criteria contained in finalized RD/RA documents must have agency approval. Determination of whether applicable regulations are affected for wastes that are outside of criteria contained in finalized RD/RA documents should be made by the regulatory agencies, not the ICDF Manager.	No change to the document. As required by ICDF Complex Approved Waste Streams, all waste streams, including special case waste, accepted at the ICDF must have an Agency approved Waste Approval Form. As discussed in the response to comment 1, any modifications to the criteria in an FFA/CO primary document will require Agency review and acceptance.
20.	Response to Comment 95	--	Use of any of the five bulleted items in the first list for physical/chemical characterization and any of the eleven bulleted items in the second list to characterize waste for profile purposes should be identified as the data source for any waste profile/acceptance forms submitted to the Agencies. Concerns regarding the use of these data will then be raised by the Agencies on the specific waste forms.	No change to the document. The only forms being submitted to the agencies is the Waste Approval Form, which uses the existing information to help determine the verification and QA requirements. Once agency approval of the waste stream is received, the source(s) of information used to characterize the waste will include a variety of sources identified on the list and will be document with the waste profile.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
21.	Response to Comment 97	--	The text has not been modified in accordance with the comment regarding the application of listed waste codes and land disposal restrictions.	Paragraph 4 of Section 2.4.2 is revised as follows: In cases where listed waste constituents are present in a CERCLA waste that has been assigned listed waste codes, but are not expected to be in concentrations causing the waste to be above LDRs, (e.g., those wastes generated outside the WAG 3 AOC, or which have triggered placement), sampling and analysis must be performed to demonstrate that the constituents are below regulatory limits for land disposal. This requirement can be met through previous investigations, such as Remedial Investigations/Feasibility Studies (RI/FS) or other CERCLA investigations. This sampling and analysis is required only for initial characterization of the waste stream. If the listed waste has a technology based treatment standard, the waste must be treated using that technology prior to land disposal, regardless of the constituent concentrations.
22.	Response to Comment 101	--	The concerns identified in items (a) through (g) are not completely resolved by DOE/ID-10960.	The results from numerous agency discussions held on 1/10, 1/14, 1/15 & 1/17 have been incorporated into form and instructions that pertain to DOE/ID-10960 (attached to this Comment/Response document). Therefore, this comment was addressed through the revision of the form and instructions.
23.	Response to Comment 102	--	Comment not entirely resolved by DOE/ID-10960.	See Response to Comment 22.
24.	Response to Comment 103	--	Comment not entirely resolved by DOE/ID-10960 as it provides no methods, or criteria to trigger collection of additional analytical data.	See Response to Comment 22.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
25.	Response to Comment 105	--	This comment, relating to aqueous wastes eligible for disposal in the evaporation pond is not accepted, given DEQs interpretation and approval of the OU 3-13 ROD.	This document only deals with the wastes that can be accepted into the ICDF Complex and does not address the eligibility of the evaporation pond to dispose aqueous wastes. The wastes that are acceptable for disposal in the evaporation pond are discussed in the Waste Acceptance Criteria for the ICDF Evaporation Pond (DOE/ID-10866), which is a component of the ICDF RD/Construction Work Plan. A review of the SSSTF RD/Construction WP was performed to identify any discussion concerning aqueous wastes eligible for disposal in the evaporation pond. The text was changed to indicate that for aqueous wastes entering the ICDF Complex, disposal would occur in the appropriate treatment and/or disposal unit. Therefore, the revised document indicates that the aqueous wastes entering the ICDF Complex will be disposed in an appropriate treatment and/or disposal unit, rather than specifically stating the evaporation pond.

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26.	Response to Comment 107	--	**Comment (a)** It is still very difficult to follow the references in this work plan. Section 3.4 refers to a "DQO QA/QC Plan." Formerly in the draft document, this was found in sub-appendix A entitled Landfill Data Evaluations Guidelines. The response to DEQ's comment 91 states that the information formerly in sub-appendix A has been incorporated into draft final Appendix J. Comparison of text between the draft and draft final version shows that former sub-appendix A is now found in Section 2.4.3 entitled "Recommended Guidelines for Waste Acceptance Procedures." However, nowhere in draft final Section 2.4.3 is there a reference to a "DQO QA/QC Plan." Please check the document for consistency, and make necessary modifications so that a reader will know what the "DQO QA/QC Plan" refers to in Section 3.4. **Comment (b)** This comment has not been adequately addressed. The document text states that the referenced DQOs "will be included in the RD/RA work plans for those waste streams that are destined for the ICDF Complex for disposal." However, some of those RD/RA Work Plans are currently finalized. Therefore, the comment asked whether the ICDF staff will have responsibility to ensure that those primary documents and associated sampling plans are modified to incorporate this information. DOE's response states, "It is not the responsibility of the ICDF management to review other WAG's documents. If the waste stream is within the WAC limits it is acceptable for disposition in the ICDF Complex." The text states that the data quality objectives, outlined in Section 2.4.3 of the WAC, will be included in the RD/RA work plans for those waste streams that are destined for the ICDF Complex. Since some of the RD/RA Work Plans were finalized long before the ICDF WAC and Section 2.4.3 were developed, they may need to be updated to address these objectives. DOE needs to identify what entity is responsible for ensuring that the referenced statement is achieved.	(a) The document will be checked for consistency, and the appropriate references identified. (b) No change to the document. The generating WAG will be required to modify their documents, as necessary, to meet the requirements provided by the ICDF management. DQO's (verification and QA requirements) as presented in Appendix S for the individual waste streams have been developed and will be provided to the WAGs. The responsibility of ICDF management is to insure that the wastes entering the complex meets both the Waste Approval Form and the WAC requirements and are adequately characterized.

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27.	Response to Comment 109	--	DEQ is simply stating that the SSA is not intended by the agencies to be a long-term storage pad for any wastes when the ICDF complex becomes operational. It is understood that >10 nCi/g wastes are prohibited from disposal in the landfill and may indeed be stored at the SSA prior to treatment and/or offsite shipment.	No change to the document. It is not the intent of the SSA to be used for the long-term storage of waste. Waste may be stored (short term) until an appropriate long-term storage or permanent disposal facility has been identified.
28.	Response to Comment 112	--	The text in the draft final document remains confusing and incomplete regarding waste verification testing. The comment response and revised text in Section 3.7 appear to be making a distinction between verification testing of the waste containers (Sec. 3.7 of Appendix J) versus other verification testing to ensure that the waste matches the waste profile (Appendix S). This distinction seems artificial, in that the two would necessarily overlap to some extent during actual operations, and would likely utilize some of the same instruments and personnel. However, DEQ will limit its comments regarding Sec. 3.7 to verification of "appropriate packaging", and will make other comments regarding waste profile verification testing. **Item (c)** Field screening techniques and specifications are important components of remedial action, and should be presented in the finalized work plan. It appears to be DOE's intention to finalize this RD/RA Work Plan as-is without the information regarding field-screening techniques. If so, a clearly define process should be developed to allow DEQ an adequate review period of the standard operational procedures for field screening prior to waste excavation and packaging. **Item (f)** It appears that the acronym under "Physical for Applicable" should be "VOCs" rather than "VCOS".	Response to Item (c). The Waste Approval Form and instructions were revised to incorporate the waste verification and QA requirements (provided with this Comment/Response document). As discussed in an earlier response, the field screen techniques will be provided in the procedure outline (requirements and philosophy) included in the Remedial Action Work Plan. The schedule for submittal of the document will be provided in the Remedial Design/Construction Work Plan. Response to Item (f). The text was revised to "VOCs".
29.	Response to Comment 115	--	Comment not accepted. The revised text could allow storage, treatment or disposal of Idaho HWMA regulated RCRA wastes at the ICDF complex. As the ICDF Complex is not a HWMA permitted facility this would not be allowed.	The text was revised and the listing of the types of waste have been deleted from that sentence. Basically, the sentence now begins with "Waste".
30.	Responses to Comments 125 through 128	--	As stated numerous times in previous SSSTF document reviews, DEQ does not accept DOE's interpretation of the AOC policy for OU 3-13 wastes. We do acknowledge that the 90 day requirement	It is DOE's position that consolidation of wastes within an AOC, under the proper regulatory approach, does not constitute storage and as a result, placement of the waste has not occurred. As discussed during the February 28, 2002, meeting, waste consolidated within

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			of 40 CFR 260.10 is not an applicable requirement for this action since this requirement establishes a timeframe for obtaining a permit to store hazardous waste and is not applicable to this action. However, we do not agree with DOE that consolidation of wastes within an AOC is an activity that would otherwise appear to be storge. There is a clear distinction between storage and consolidation. If DOE is not clear on this distinction than perhaps the use of temporary waste staging piles and temporary units would provide a more appropriate requlatory approach for managing some materials within the AOC.	during the February 28, 2002, meeting, waste consolidated within staging piles being operated in accordance with 40 CFR 264.554 is not considered storage, and placement will not occur provided the waste is removed within two years of the date that the waste was moved into the staging pile. This operational approach is important since it allows the ability to stage CERCLA waste during the winter months, when the ICDF landfill is not operational, for later disposal in the landfill once it is operational. DOE has identified that the use of staging piles under 40 CFR 264.554 will allow sufficient flexibility to operate the ICDF Complex with respect to waste staging and consolidation. Prior to the discussion, DOE had identified three areas for potential waste staging piles. However, only the following two areas are being considered: (1) portion of the existing Staging and Storage Annex and (2) portion of the ICDF Complex within the fenced area and outside the boundaries of the landfill. It is understood that approval of staging piles is dependent upon the design standards as well as the operational conditions. This was preliminarily addressed during the February 28, 2002, meetings with a summary of the information provided to the Agencies as follows: **Location:** • 40 CFR 264.554 Staging Piles (named 554 Units) will only be designated within the limits of the ICDF Complex as identified in the ICDF Complex Remedial Action Work Plan. • More than one 554 Units may be designated at the ICDF Complex. **Design Standards:** • Within fenced area of the ICDF Complex. • Roped off area with appropriate signage. • Physical dimensions. • Description of the base material (i.e., type of pad, soil, etc.). • Waste can be consolidated within a container (i.e., roll-on/roll-off, drum, waste box, etc.). • Waste can be consolidated in soil or debris piles on liners (Note:

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				During the February 28, 2002, meeting, DEQ and EPA indicated that management and closure of the unit may be more difficult). • Adequate run-on/run-off control. • Adequate control for wind dispersion. • Independent PE certification. **Operational Conditions:** • 554 Units will be identified in the RA Work Plan. • Waste tracking will be performed. • Waste inspection will be performed. • Time limitation is two years, otherwise moved to an appropriate storage location. • Waste will include soil or debris, solid, and non-flowing. • Hydrogeologic conditions are the same throughout the ICDF Complex. • Incompatible wastes will not be stored in close proximity. • At the completion of the active life of the ICDF, all 554 Units will be closed in accordance with 40 CFR 264.554(k). Justification needs to be provided for the use of staging piles beyond the two-year period. In summary, it appears that the use of staging piles will allow sufficient flexibility for the operation of the ICDF Complex. Therefore, the use of staging piles (including both the design and operational conditions) will be identified in the ICDF Complex Remedial Action Work Plan. Waste currently in the SSA and waste accumulated until the ICDF Complex Remedial Action Work Plan is final will be considered in storage. Once the ICDF Complex Remedial Action Work Plan is final, waste management will be dependent upon the unit's designation and associated handling procedures.
31.	Response to Comments 129 and 130	--	These comments were not adequately addressed.	See response to Comment #30.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
32.	Response to Comment 131	--	From the response to this comment, it appears to be DOE's intention to finalize the RD/RA Work Plan as-is, without the technical procedures for SSSTF operational work. If so, a clearly-defined process should be developed to allow DEQ an adequate review period of the operational procedures prior to the pre-final inspection.	A clearly defined process to allow DEQ adequate review of the procedure requirements and philosophy was provided in the DOE letter dated 1/31/02. According to this letter, this information will be included in the Remedial Action Work Plan, which is a FFA/CO primary document subject to the review periods of the primary document. This schedule will be incorporated into the SSSTF Remedial Design/Construction Work Plan.
33.	Response to Comment 146(b)	--	It is unclear why the response refers to the O&M Manual, rather than this O&M Plan. Checklists have been inserted in Appendices C and D of this draft final plan. These should be the finalized checklists. Please explain any need to modify them further.	The response to the comments to the draft document inadvertently stated O&M Manual and should have stated O&M Plan. The checklists in Appendices C and D are final and will not be modified further.
34.	Response to Comment 151 and 152	--	These issues were removed from Appendix A and place in Appendix J. Representative sampling however is still not addressed. Section 2.4.3.2, DQR, Page 2-6, of Appendix J. describes a process to develop a "conservative mean" sample concentration. This term is not adequately defined; however, a stated purpose of using the conservative mean is to prevent the overestimating the contaminant loading in the ICDF. DEQ believes that understating the contaminant loading of the ICDF is inappropriate.	No change to the document. The conservative mean is identified in the text as the mean having concentrations greater than detection limits (all non-detect data eliminated from consideration). This is the appropriate mean to use for waste characterization, since wastes with non-detect concentrations will not be disposed at the ICDF.
35.	Response to Comment 153(b)	--	Verification must be performed to ensure there are no free liquids remaining in the box prior to land disposal for all containers that can be opened with no compromise of ALARA concerns.	The following text will be added at the end of the Technical Specifications for Debris Treatment Process (Appendix K, O&M Plan, Subappendix A): Visual verification to ensure that no free liquids remain in the boxes prior to disposal in the landfill will be performed on 20% of the boxes that do not have ALARA concerns. Visual verification will not be performed on those boxes that comprise ALARA concerns.

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
36.	Response to Comment 168	--	The response to the comments misses the intent of the concern. In the processing of waste by stabilization treatment, the pH of the waste may be altered by the addition of some type of alkali. Some heavy metals can become soluble at elevated pH ranges normally used for stabilization chemistry. Therefore, the final "treated" waste must have all TCLP metals scanned not just the original metal of concern.	The amount of reagents added to the waste will not significantly increase the pH to cause mobilization of other heavy metals. The text will be clarified in Section 5, 2nd Sentence of Appendix Q, Treatability Study Test Plan, to state: "As required by 40 CFR 268.40 (e), characteristic waste will be analyzed for the TCLP metals and all underlying hazardous constituents (UHCs) to demonstrate compliance with the Universal Treatment Standards (UTS).

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DOCUMENT TITLE: Appendices Volume 1 of 2, Appendix C, Design Specifications

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
1.	Section 15480, Sterilization of Water Piping	2 of 3 Lines 44 & 45	Please correct the spelling error associated with the word coliform. Also, these lines in the specification state that the testing is for fecal or total coliform. The test must be for total coliform. Please modify the text.	The text will be modified to the correct the spelling and to include testing for total coliform. The references to fecal coliform will be deleted.
2.	Section 15801, Air Distribution System	--	The off-gas ducting should be equipped with clean-out ports at any point where PM may accumulate including, but not limited to, drop traps and the base of vertical runs.	Clean-out ports will be provided in the specifications and drawings where applicable. See Sheet HV-1 and Spec. 15801 page 4 of 7.

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DOCUMENT TITLE: Appendix D, Design Drawings

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
3.	Electrical Drawing E1	--	There does not appear to be any electrical power provisions for the mechanical treatment system that will be added to the Decontamination Building. This is normally a large electrical demand.	A 500 kW Transformer is included in the plans. The total estimated load is 513 kW including a 25% contingency for treatment (i.e., 100 kW). The actual interface of the treatment equipment will be coordinated with the equipment supplier, when a supplier is selected. The electrical blank box or breaker panel for the mechanical treatment system will be included on the revised drawing. See Sheets E-1and E-8.
4.	Sheet U-4, Plan and Profile 15+60 to 18+48.98	--	Please show that the vertical clearance between the clean water line and the percolation pond SW line is in accordance with minimum vertical clearance requirements.	The clearance is 0.7 ft. Since this is less than the standard, it is planned to encase the potable water pipe with concrete. The plan and profile on sheet U-4 will be clarified.
5.	Sheet U-2, Plan and Profile 10+00 to 12+80	--	All dead end water mains should be equipped with a means for flushing.	No change to the document. No dead ends are planned. The dead-ends shown on the plans will be connected to the utilities on the ICDF project. The total system will then be flushed and tested before it is put into use on the ICDF project.

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DOCUMENT TITLE: Appendices Volume 1 of 2, Appendix J, ICDF Waste Acceptance Criteria,

and

Appendices Volume 2 of 2, Appendix J, ICDF Complex Waste Acceptance Criteria, DOE/ID-10881, Appendix A, Operational Philosophy of the ICDF Evaporation Pond Corrective Action Management Unit

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
6.	Section 2.2, General Class of Waste, Table 2.1 Figure 3.2	2.2 3.3	DEQ Comment 97, ICDF 60% Design Review stated that since the NESHAP model included source terms for only the purge water and ICDF leachate disposal of other liquids cannot be approved because NESHAP compliance has not been demonstrated. The DOE response was that this is a waste acceptance issue. DOE committed to reducing the radionuclide loading to the landfill by an amount proportional radionuclide loading in the Evaporation Pond. This is not a simple mathematical exercise because behavior of radionuclides in the landfill is significantly different that that of the same radionuclides in the Evaporation Ponds.	No change to the document. This comment is not applicable to the SSSTF RD/CWP. It deals specifically with disposal of waste to the ICDF landfill or evaporation pond described in the ICDF RD/CWP. NESHAP modeling was performed for the SSSTF as part of the 30% PDR. This evaluation determined the Appendix D impacts to be less than 0.1 mrem/yr based on the large treatment facility envisioned in the 30% PDR.
			The Waste Management Plan (Appendix M, Section 4.3.3, Page 4.2) indicates that the decontamination water (and landfill leachate) do not require characterization due to the CAMU designation. DOE must explain how they will adjust the landfill radionuclide loading to account for the undetermined radionuclide source term associated with the decontamination water. This will be especially important if the SSSTF receives waste that are processed and shipped off-site for disposal.	First, it is intended that decontamination water will be disposed to the evaporation pond and not the landfill. Second, the issue of radionuclide determination is addressed in the O&M Plan of the ICDF Complex RA Work Plan and is not part of this submittal.
			The Evaporation Pond Waste Acceptance Criteria (DOE/ID-10866) indicates that the radionuclide limits were established based on the 15 mrem/year off-site receptor limit. The Waste Acceptance Criteria (WAC) and ongoing operating record must address the how NESHAPs compliance will be assured. Annual sampling to demonstrate compliance is insufficient because DOE will place volatile radionuclides in the Evaporation Pond. The volatilization rate for these constituents will vary with the temperature of the pond. Further, it is expected that the activity associated with the Evaporation Pond will gradually increase with time since regular removal of the pond solids is not planned.	No change to the document. This comment is on a document that is not part of the SSSTF WP. The comment should be made on the appropriate document, which is part of the ICDF RD/Construction Work Plan. The 15 mrem/yr. is a combined dose of all pathways to the uninformed public. The NESHAPs limit is 10 mrem/yr. to the MEI.

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DOCUMENT TITLE: Appendices Volume 1 of 2, Appendix J, ICDF Waste Acceptance Criteria,

and

Appendices Volume 2 of 2, Appendix J, ICDF Complex Waste Acceptance Criteria, DOE/ID-10881, Appendix A, Operational Philosophy of the ICDF Evaporation Pond Corrective Action Management Unit

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			The *15 mrem/year* standard would not apply only to the ICDF emissions. The MEI must not receive 15 mrem/year from all CERCLA activities on the INEEL. Since other locations are involved in active remediation, the contribution from these sources must be subtracted from the site-wide CERCLA total to arrive at the allowable ICDF radionuclide emission standards and WAC. (Note: if each remedial action could have a 15 mrem/year impact to the MEI, the total dose to the MEI located at Frenchman's Cabin cold exceed 75 mrem/year from the combined emissions of CFA, PBF, RWMC, TRA and INTEC.)	The Federal NESHAP requirement (which is the applicable ARAR) is that a facility with emissions >0.1 mrem/year must have a permit to construct with a maximum allowable exposure of 10 mrem/year to the MEI. The SSSTF treatment unit does not have emissions >0.1 mrem/year so no permit to construct was required. The EP and landfill emissions are >0.1 mrem/year; however, under CERCLA no permit is required. EDF-ER-290 calculated the emissions based on the design inventory outlined in EDF-ER-264. Those emissions determined that the emissions, assuming 37% of the total waste available for ICDF disposal came into the site within 1 year, were 0.046 to 0.06 mrem/year. Based on the last 14 years of emissions from the INEEL, the maximum emission was 0.06 mrem/year. Therefore, the ICDF Complex could emit up to 9.94 mrem/year and still maintain the INEEL 10 mrem/year exposure at the boundary. However, it is recognized that in order to protect workers, the public, and the environment, the emissions from the ICDF (which includes the SSSTF) will be controlled to reduce the dose to the MEI. The goal of the ICDF Complex is to have an annual emission of less than 1 mrem/yr to the MEI. Language has been added to Sections 4.1.3 and 5.4.3 to state that the ICDF Complex will not exceed the Federal limit and have set operational goals as 1 mrem/year. If the operational goals of 1 mrem/year is exceeded, the Agencies will be notified.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendices Volume 1 of 2, Appendix J, ICDF Waste Acceptance Criteria,

and

Appendices Volume 2 of 2, Appendix J, ICDF Complex Waste Acceptance Criteria, DOE/ID-10881, Appendix A, Operational Philosophy of the ICDF Evaporation Pond Corrective Action Management Unit

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			The WAC establishes acceptable limits of 0.0pCi/L for many radionuclides not expected in the leachate. The Evaporation Pond Waste Acceptance Criteria found in DOE/ID-10866 does not include criteria for those radionuclides not expected in the leachate. Radionuclides without established limits should not be accepted for disposal in the evaporation pond.	No change to the document. This comment is on a document that is not part of the SSSTF WP. The comment should be made on the appropriate document, which is part of the ICDF RD/CWP.
			The WAC is designed to comply with the CERCLA NESHAP dose limit of 15 mrem/year to the off-site receptor. DEQ has previously identified that exceeding the 0.1 mrem/year dose to the off-site receptor, while not impacting ICDF operations, will trigger Potential for Significant Deterioration standards invoking Best Available Control Technology requirements for all new or modified emission sources on the INEEL.	After a close examination of the NESHAP regulations, in conjunction with the IDAPA rules, DOE has determined that 10 mrem/year is the Federal NESHAP limit at the site boundary. If the ICDF Complex were to exceed the 0.1 mrem/year State limit, the ICDF Complex would be required to get a permit, except CERCLA actions are exempt from permitting requirements. Only if the off-Site emission was to exceed 3 mrem/year would the INEEL become a significant facility and be required to get a permit for all new facilities subject to permitting requirements. In the last 14 years, the highest actual emission (when the INTEC stack, RWMC, and WERF were operational) was 0.06. Therefore, this comment would only apply if the INEEL were to exceed the 3 mrem/year state limit.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix J, ICDF Waste Acceptance Criteria				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
7.	Section 3.1, Waste Flow Through Process Box 7	3-1	There is no indication of ICDF Waste acceptance personnel. This concept should be added here to remove the implied concept that the generator will verify the waste meets the WAC.	Instruction for Box 7 will be revised to say" The generator (**with ICDF oversight and acceptance)** will conduct waste profile verification at the remediation site.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix K, Operations and Maintenance Plan (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
8.	Figure 3-2, Waste Flow Through the ICDF Complex	3.3	Block B-15 (Repackage Waste) has no outlet path. It appears that the outlet path (arrow) should re-enter the flow diagram between B-14 and B-17. Please clarify.	The document was modified to show an arrow connecting box B-15 with box B-17.
9.	Sub-Appendix C, ICDF Weekly Container Inspection Checklist and Deficiency Resolution Tracking Table	C-5	A section should be added that requires the person making the notation to date and initial the comments.	A column will be added to the table for entry of date and initials of person making the entry.
10.	Sub-Appendix D, Waste Profile	D-4	The form is not corrected under section 6 last line. Change "SSA" to "ICDF".	This comment does not fit with Appendix K. There is no Waste Profile in Appendix K. In review of the documents with Waste Profiles as Appendices, it was found that Appendix J (WAC) has a Waste Profile and on page D-4, Section 6, last line, there is a reference to the SSA. This will be changed to ICDF.
11.	Sub-Appendix D, ICDF Daily Tank Inspection Checklist and Deficiency Resolution Tracking Table	D-5	Same comment as above.	A column will be added to the table for entry of date and initials of person making the entry.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix M, ICDF Complex Operations Waste Management Plan (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
12.	Section 3.2, Waste Identification	3.1 fourth bullet	The presence of hazardous only waste in the SSSTF triggers IDAPA 58.01.05.008 [40 CFR 264 Subpart CC] as an applicable ARAR.	No change to the document. It is agreed that if a waste stream is hazardous only the subpart CC is applicable. However, there are no waste within the inventory which are "hazardous only" above 500 ppm. If these wastes are identified, the work plan will be modified in accordance with the FFA/CO.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix S, ICDF Complex Approved Waste Streams, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
13.	General Comment	--	This appendix does not satisfy DEQ concerns regarding the need to approve waste profiles. DEQ is concerned that the wastes that are accepted into the ICDF complex have not been adequately characterized. DOE plans to prepare the waste profiles based on existing data, prior to excavation at the contaminant site. As previously stated in written comments, investigation data used for remedy selection may not be representative of remediation wastes encountered once excavation occurs. Therefore, the waste profile verification step is critical to ensure that the excavated wastes have been accurately approximately on waste profile. Appendix S assigns waste verification procedures (i.e., Tiers 1-3) based on existing data concentrations, which may not be representative of waste that will be encountered when excavation begins. This is especially a concern for sites at which the area of suspected greatest contamination was inaccessible for sampling during the RI due to buried pipes/utilities and/or structures, or for sites at which there were no surface indications of hotspots. Pre-ordaining the level of verification needed at a dig site, based on existing data which are not representative, will yield only a flawed waste verification process.	This subject was the topic of numerous agency calls (1/10, 1/14, 1/15, and 1/17). A revision to the Waste Acceptance Form and instructions were provided with the comment response attached to the 1/21/02 submittal. Concurrence was achieved during the 2/13/02 Agency meetings and all suggestions will be incorporated into the form, instructions, and document. The completed Waste Approval Forms for the individual sites (Appendix B) will be revised and submitted during the ICDF Complex RA Work Plan. The submittal of the Waste Approval Forms is identified in the revised schedule provided in the SSSTF Remedial Design/Construction Work Plan.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix S, ICDF Complex Approved Waste Streams, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
14.	Introduction	1	Neither Appendix J nor Appendix S address the requirements of 40 CFR §262.11 and 40 CFR §264.13(a)(3) and (b) to revisit the waste characterization "as necessary to ensure that it is accurate and up to date." This is especially critical for sites with subsurface or other releases where the initial characterization effort might not have identified the spectrum of contaminants and contaminant concentrations present in the waste.	Section 4.1 of the ICDF WMP (appendix M) is revised to read as follows: "Waste generated during operations of the ICDF Complex will be characterized in accordance with 40 CFR 262.11, company procedures, and appropriate screening methods. As outlined in Section 3, classifications have been made of anticipated waste types based on process knowledge regarding the source(s) of the expected waste. Subsequent to generation, any or all of the waste may be reclassified. All appropriate and required documentation of waste characterization and hazardous waste determination (HWD) will be completed. Prior to ultimate disposal, waste may be further characterized to ensure compliance with the applicable WAC. Appropriate and required documentation of waste characterization will be completed. Waste designated for the evaporation ponds do not require characterization due to CAMU designation."
			The Waste Acceptance Criteria is limited by the more conservative of the ICDF design criteria and the 15-mrem/year limit to the maximally exposed individual. The risk assessment is based on the design inventory, not the NESHAP off-site exposure limit. Insufficient data has been presented to demonstrate the WAC is protective of human health and the environment. Repeated off-site doses approaching the maximum will likely result in soils in the vicinity of the ICDF exceeding remedial action concentrations. Further, limiting the WAC based on the total allowable off-site dose does not take into account the fact that other CERCLA radionuclide emission sources are present on the INEEL. These other sources combined with the ICDF emission must be below the dose standard. Thus, the current WAC overstates the allowable ICDF radionuclide emissions. NESHAP compliance is not demonstrated.	This issue will be resolved as part of the ICDF RD/Construction Work Plan (which deals with the landfill and evaporation pond disposal operations) and when the individual sites are submitted for the Waste Approval Process (see response to comment 13). This issue will be resolved as part of the ICDF RD/Construction Work Plan (which deals with the landfill and evaporation pond disposal operations) and when the individual sites are submitted for the Waste Approval Process (see response to comment 13).

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix S, ICDF Complex Approved Waste Streams, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
15.	Section 1, Last Sentence on Page	1	The text states that, *"Finalization of the SSSTF RD/RA work plan will be the Agency approval of these waste streams for entrance into the ICDF Complex."* The Summary Waste Approval Forms provide insufficient information for DEQ to fully determine whether the wastes have been adequately characterized and/or whether the proposed level of verification is sufficient. As stated previously in written comments, DEQ needs to approve waste profiles with attached analytical data.	See response to comment # 13.
16.	Section 2.3, Last Sentence under Section Heading Section 2.4, First Paragraph, Last Sentence	3 3	The referenced text indicates that DEQ and EPA have to review and approve all of the Summary Waste Approval Forms, which were provided for the first time, in the draft final RD/RA work plan, or develop and submit a "written statement of dispute" within 30 days. The regulatory agencies must not be put in the position to have to prepare dispute resolution paperwork every time we question information on a waste profile. The approval could be like the "Notice of Disturbance" or "New site Identification" processes.	See response to comment # 13.
17.	ICDF Complex Summary Waste Approval Instruction and Blank Form, Item 6, Waste Information	A-5	Delete "other (identify)" checkbox for the Evaporation Pond and replace with "NA". Add checkboxes for "Well Development Water", and "Aquifer Test Water" for the Evaporation Pond. Delete checkboxes for offsite disposal of "Well Cuttings", "Decon Fluid", and "Purge Water", as this is not a likely path of disposal for these wastes.	See response to comment # 13.

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DOCUMENT TITLE: Appendix S, ICDF Complex Approved Waste Streams, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
18.	Item 10, Anticipated Waste Verification	A-6	Tier 0 and 1 on the form need to be eliminated as they do not provide for meaningful waste characterization for disposal at the ICDF. Tier 2 and 3 are more in line of what is anticipated for "at the excavation" characterization. Use of Tier 1 methods such as PID evaluation and visual observation is still viable, but only in addition to completing Tier 2 or 3. The majority of the Completed Summary Waste Approval Forms in Appendix B. have a 0 or 1 Tier Level marked in the Waste Verification Method and Requirement Column. Because of data gaps and anecdotal information used to describe each site, process knowledge alone cannot be relied upon to adequately characterize waste prior to disposal. There must be verifiable analytical data on the waste prior to acceptance.	See response to comment # 13.
19.	Completed Summary Waste Approval Forms, Sub-Appendix B, VOC Concentration Data attached to SWAFs	--	The Waste Acceptance Criteria VOC concentrations are three orders of magnitude higher than the corresponding Design Inventory concentrations found in EDF-ER-315, *IDAPA Air Compliance*. The individual VOC constituent concentrations for many of the waste streams submitted for approval exceed the concentration used I the compliance model (e.g. benzene, concentrations in the waste listed on pages B-103 through B-107 exceed the concentration in EDF-ER-315). The air compliance document must use conservative assumptions in order to demonstrate compliance with the IDAPA regulations.	The completed Waste Approval Forms for the individual sites (Appendix B) will be removed from the document and submitted the ICDF Complex RA Work Plan at a later time. The submittal of the Waste Approval Forms will be identified in the revised schedule provided in the SSSTF RD/Construction Work Plan.
20.	Sub-Appendix B	B-111	Item 10, Comments Section for Site CPP-88, NOD Soils contains an asterisk that appears to indicate there is incomplete waste verification anticipated. DEQ cannot agree to a blanket waste acceptance approval for this site as requested as "hot spots" encountered may need additional characterization and agency input to discern a path forward.	The completed Waste Approval Forms for the individual sites (Appendix B) will be removed from the document and submitted the ICDF Complex RA Work Plan at a later time. The submittal of the Waste Approval Forms will be identified in the revised schedule provided in the SSSTF RD/Construction Work Plan.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix S, ICDF Complex Approved Waste Streams, DOE/ID-10960 (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
21.	Sub-Appendix B	B-124	Please see comment for site CPP-88 above.	The completed Waste Approval Forms for the individual sites (Appendix B) will be removed from the document and submitted the ICDF Complex RA Work Plan at a later time. The submittal of the Waste Approval Forms will be identified in the revised schedule provided in the SSSTF RD/Construction Work Plan.
22.	Sub Appendix B	B-128-129	Item 6 states that 14,000 gallons of waste with F001, F002, F005 and U134 waste codes will be disposed of in the evaporation pond. However, Item 10 does not list any Tier Level for the Anticipated Waste Verification method. This contradicts the information presented in the Evaporation Pond Liner Compatibility analysis.	The completed Waste Approval Forms for the individual sites (Appendix B) will be removed from the document and submitted the ICDF Complex RA Work Plan at a later time. The submittal of the Waste Approval Forms will be identified in the revised schedule provided in the SSSTF RD/Construction Work Plan.
23.	Sub Appendix B	B-172-173	Item 5 describes the source description as two tanks, surface soils, and absorbed tank liquids. Item 6 lists 10,216 yd3 of solid material. It is DEQ's understanding is that tanks exceeding 10,000 gal. in volume cannot be disposed in the ICDF. Please state the actual waste(s) and form(s) intended for landfill disposal.	The completed Waste Approval Forms for the individual sites (Appendix B) will be removed from the document and submitted the ICDF Complex RA Work Plan at a later time. The submittal of the Waste Approval Forms will be identified in the revised schedule provided in the SSSTF RD/Construction Work Plan.

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DOCUMENT REVIEW, COMMENT, RESOLUTION LIST - IDEQ

DOCUMENT TITLE: Appendix Q, Treatability Study Test Plan (This document and associated resolutions will be part of the ICDF RA WP)

Item	Section/ Figure/ Appendix	Page	Comment	Resolution
24.	Section 3.1	3.1 bullet 3	The text addresses the need to verify that stabilization is providing an additional benefit beyond dilution. In the remainder of Appendix Q there is no reference about the dilution factor verification. Additional language outlining the evaluation of the dilution effect should therefore be added to Section 3.3.7 on page 3.7 " Test Plan Strategy ".	DOE recognizes that dilution is not an acceptable form of treatment. The treatability study will determine the appropriate amounts of reagents to use to effectively treat the contaminants. The dilution effects will be evaluated as part of the treatability study and subsequent treatment. The following paragraph will be added to the end of Section 3.3.7 of the Treatability Study Test Plan: "A determination to show that dilution is not the controlling factor will be conducted on those treatability studies where the waste loading is less than or equal to 50% of the treated waste. The treatability study will demonstrate that "dilution through treatment" of hazardous constituents will either remove or immobilize those constituents to satisfy the fundamental statutory requirements."

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DOCUMENT TITLE: Appendices Volume 2 of 2, ICDF Complex Waste Acceptance Criteria, DOE/ID-10881				
Item	**Section/ Figure/ Appendix**	**Page**	**Comment**	**Resolution**
25.	Appendix A, Operational Philosophy of the ICDF Evaporation Pond Corrective Action Management Unit, Section A-4, Issue Resolution, Item 2	A-10	DEQ agrees that the ROD designates purge water, ICDF leachate, and other aqueous wastes generated as a result of operating the ICDF complex (e.g., decontamination water) for acceptance into the ICDF Evaporation Pond Corrective Action Management Unit, assuming the NESHAPs issue is adequately addressed.	Comment Noted. This policy-type document was removed from the SSSTF RD/Construction Work Plan (see comment #30).

ICDF COMPLEX WASTE APPROVAL FORM[1]

To Be Filled Out by Generating Source

1. Tracking ID: WAG _____ OU _____ Site _____

   Waste Zones (if applicable): _____

2. CERCLA Site Name: _____

3. Is this a CERCLA waste? ☐ Yes ☐ No (If No, waste is not acceptable in the ICDF Complex and there is no need to complete the form.) ☐ Remedial action with ROD ☐ Removal action with NCP-compliant action memorandum ☐ IDW ☐ NOD-generated waste (exceeds RAOs of ROD)

   CERCLA Document Reference: _____

4. Anticipated Shipment Date: _____

5. Source Description (See instructions for information to be included in this narrative.)

   CERCLA Document(s) used to complete this section (reference, page, section): _____

   Site Layout: _____

   Description:

6. Unique Waste Characteristics:

1. This form represents the known data as of the date of submittal.

7. Waste Information:

	Waste Form		Waste Description (check all that apply)						Anticipated Waste Contaminants[2]										SSSTF Treatment (if needed)		Volume (per waste description)
Potential Staging or Disposal Destination	Nonaqueous	Aqueous	Soil	Debris	Well Cuttings	Decon Fluid	Well Water[3]	Other (identify below)	VOCs	SVOCs	PCBs	Pesticides/Herbicides	TCLP Metals	Inorganics	Asbestos	Gamma Radionuclides	Alpha/Beta Radionuclides	Other (explain below)	Debris Treatment	Soil Stabilization	yd^3 (solids) or gal (aqueous)
Landfill	☐	NA	☐	☐	☐	NA	NA	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Evaporation pond	NA	☐	NA	NA	NA	☐	☐	☐	☐	☐	☐	☐	☐	☐	NA	☐	☐	☐	NA	NA	
Storage	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	
Off-Site	☐	☐	☐	☐	NA	NA	NA	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	

NA – not applicable

Other (Identify/Explain):

8. Anticipated TSCA/HWMA/RCRA Waste Codes: _____

   Rationale for Anticipated Waste Codes: _____

9. Waste Information Generated by: _____
   WAG Project Manager (print name)

   _____ Date: _____
   Signature

2. Estimated concentration data (if available) must be attached to this form. Identify (on the attachment or in Comments below) the CERCLA site characterization document that provides the "Anticipated Waste Contaminant" levels. Omission of a contaminant on the attachment means that the contaminant was not identified as a primary waste contaminant. (See instructions for preparing Section 5, Source Description.)

3. Well water includes development, purge, test, sampling, and other water generated from CERCLA activities associated with INEEL perched water and Snake River Plain Aquifer wells.

To Be Filled Out by ICDF Personnel

10. General Waste Information:

☐ Waste generated within WAG 3 AOC
☐ Waste generated from outside WAG 3 AO
☐ Waste staged/stored/treated prior to shipment to the ICDF Complex

11. Preliminary Waste Information and Verification

Contaminant Type	Confidence Level[4]	Key Contaminants	Potential Concentration Range	Anticipated WAC Limit	Preliminary Waste Verification Requirements	Preliminary Waste Quality Assurance Requirements	Waste Characterization Requirements
VOCs							
SVOCs							
PCBs							
Pesticides/herbicides							
RCRA metals							
Inorganics							
Asbestos							
Gamma radionuclides							
Alpha/beta radionuclides							

12. ICDF Information Generated by: _____
(print name)

_____ Date: _____
Signature

Comments: _____

4. The existing data have been evaluated, using Track 1 Guidance, to determine the confidence level.

Instructions for Completion of the ICDF Complex Waste Approval Form

This provides instructions to assist in the preparation and review of the ICDF Complex Waste Approval Form (WAF). The WAF has two separate sections. The first section is prepared by the generating source and provides the background information on the waste along with the applicable references. The second section is completed by ICDF personnel and identifies the preliminary waste information and verification needs for the wastes.

The following information is to be completed by the generating source:

1. **Tracking ID:** Generating source will enter the appropriate WAG number (1 through 10), the appropriate OU (for example, 3-13), and the appropriate Site (for example, CPP-92). If there are distinct contamination zones that will require separate management due to unique contaminants or levels of contamination, identify.

2. **CERCLA Site Name:** Provide the unique description for the CERCLA site where the waste is being generated such as the site description from the FFA/CO (Table A-2 of the FFA/CO), Final Record of Decision, or the Notice of Disturbance (NOD) description, as appropriate.

3. **Is this a CERCLA waste?** If not, the waste cannot enter the ICDF Complex. If it is, check the appropriate box to indicate the CERCLA action that allows the waste into the ICDF Complex. If the CERCLA action is a removal action with NCP-compliant action memorandum, the memorandum needs to be detailed in the CERCLA Document Reference section. Include appropriate page, section, and document.

4. **Anticipated Shipment Date:** Provide the appropriate month and year the waste is expected to be shipped to the ICDF Complex.

5. **Source Description:** This section should provide a detailed description of the source so that the characteristics of the waste can be determined for this evaluation. Include the following support documents/references:

   - CERCLA Document(s) – References for the information source(s) used to complete this section (document, section and page). If the referenced documents have not been provided to the agencies previously, attach the applicable pages or the document.

   - Site Layout - This site layout should depict pertinent information associated with the site. This information should include extent of the site, sampling locations, and appurtenances, such as buildings, in the proximity of the waste site. This information may be a reference to existing drawings that have been submitted to the agencies (cite the document, section, and page number) or may be included as an attachment to this form.

   Provide sufficient information on the source of contamination so process knowledge can be used for preliminary planning purposes. At a minimum, the source description should provide information on the occurrence of contamination, contaminated media (soil, debris, water, etc.), and estimated volumes of contaminated media, as well as a description of the primary waste contaminants. Primary waste contaminants are defined as

- Contaminants of concern (COCs) identified from individual remedial investigations/baseline risk assessments

- Contaminants exceeding remediation goals from individual Records of Decision

- Other contaminants that are significant for waste management at the ICDF Complex (i.e., listed hazardous constituents and/or codes, significant contributors to operational risk, underlying hazardous constituents, etc.).

For the primary waste contaminants, both the maximum concentration expected to be present in the waste and the cleanup action level identified in the appropriate CERCLA document should be included in this section.

This section may also provide information on whether the contamination occurs in distinct zones that will be used during site remediation planning. Specific information on waste with varying degrees of contamination, if available, may be used to help characterize the waste and more accurately define the verification and quality assurance (QA) requirements. Types of information that may be used to help define different waste zones of contamination within a site include spatial distribution (i.e., depth or lateral dependency) or media type (i.e., soil, sludge, debris, etc.).

6. **Unique Waste Characteristics:** Describe any unique characteristics that may be used to help characterize the waste during remediation or that may be used during waste verification or QA.

7. **Waste Information:** List the known radiological and chemical contents of the waste. Mark all the boxes in the appropriate rows that apply (e.g., wastes may be sent to the landfill, evaporation pond for storage, or off-Site). In the last column, specify the volume and a brief description of the applicable waste stream (e.g., soil, debris, drill cuttings). Check the boxes to identify the waste contaminants and, as specified in the footnote, attach the concentration data to this form and provide a reference source. If treatment is required, specify the treatment method anticipated.

8. **Anticipated TSCA/HWMA/RCRA Waste Codes:** Provide anticipated TSCA, HWMA, or RCRA waste codes that are anticipated to be present in the waste. Include the rationale for applying the waste codes.

9. **Waste Information Generated by:** Appropriate WAG Project Manager will print and sign name and enter the date Sections 1-9 were completed.

The following information is to be completed by ICDF Complex personnel (or designee).

10. **General Waste Information:** Check the appropriate boxes regarding whether the waste was generated within the WAG 3 AOC; was generated outside the WAG 3 AOC; and/or will be staged, stored, or treated prior to shipment to the ICDF Complex.

11. **Preliminary Waste Information and Verification**: This section identifies the key waste contaminants and determines the preliminary waste verification and QA requirements that will be used for waste characterization purposes. The columns for contaminant types and their information requirements are described below:

    Contaminant Type: This column identifies the various contaminant types that may be present in the waste. This grouping will be used to help determine waste characterization, verification, and QA requirements.

Confidence Level: A confidence level of low, medium, or high will be assigned to the contaminant type based upon an understanding of the release source and available characterization data (i.e., data quality and quantity). The low, medium, and high designations will be the same as used during the Track 1 evaluation.

Key Contaminants: A listing of key contaminants will be provided in this column. Key contaminants are defined as those contaminants that contribute significantly to the risk at the site or may influence the management of the waste from generation to disposal. Not all contaminants identified in Section 5 are key contaminants.

Potential Concentration Range: Provide the concentration range expected to be encountered during remediation. The low end of the range will correspond to the action levels identified in Section 5, if available.

Anticipated WAC Limits: Provide the anticipated disposal facility's waste acceptance criteria (that is, maximum concentration) for the key contaminants previously identified.

Preliminary Waste Verification Requirements: Determine the preliminary waste verification requirements for acceptance into the ICDF. Verification will be performed to ensure that the waste characteristics remain within the limits identified on the waste profile. In general, the preliminary verification requirements will be based upon the associated WAC limits and confidence levels, using the Tier 1-4 criteria described in this section. Note that other criteria, such as waste management, operational risk, etc., can be used to help determine the preliminary verification requirements.

Tier 1 – Contaminant type is not expected to be present in the waste stream based on process knowledge and/or available analytical data. Visual inspection will be performed during excavation to verify that the physical characteristics (e.g., color, texture) of the wastes remain within the waste profile description.

Tier 2 – Maximum concentration of the contaminant is less than 20% of the WAC limit. Visual inspection will be performed during excavation to verify that the physical characteristics of the wastes remain within the waste profile description. Waste verification using portable field instruments (e.g., field radiation instruments, PIDs, OVA) will be performed on 10% of the containers being shipped to the disposal facility.

Tier 3 – Maximum concentration of the contaminant is greater than 20%, but less than 80% of the WAC limit. Visual inspection will be performed during excavation to verify that the physical characteristics of the wastes remain within the waste profile description. Waste verification using mobile laboratory analyses (e.g., colormetric testing, pH, PCB field kits) will be performed on 10% of the containers being shipped to the disposal facility.

Tier 4 – Maximum concentration of the contaminant is greater than 80% of the WAC limit. Waste verification will be performed using fixed laboratory analyses in accordance with the site-specific sampling and analysis plan, following review and approval by ICDF personnel.

Preliminary Waste Quality Assurance Requirements: Determine the preliminary waste QA requirements for acceptance into the ICDF. QA sampling will be performed on the waste to provide a better understanding of whether the contaminant concentration is within the limits identified on the waste profile and whether other unexpected

contaminants may be present. The amount of QA sampling is dependent upon the confidence level of the data, key contaminants, variability of the concentration data, WAC limits for the disposal facility, etc. As a general rule, QA sampling will be performed on 5% of the containers being sent to the ICDF Complex using the next higher tier level identified for the verification sampling. If the verification tier level is Tier 4, the QA sampling level will be Tier 4 also.

Waste Characterization Requirements: In this column, identify waste characterization requirements pertaining to verification and QA.

12. **ICDF Information Generated by:** Identify the person responsible for reviewing Sections 1–9 and completing Sections 10 and 11 of this WAF. This person dates and signs the form indicating when it was generated.

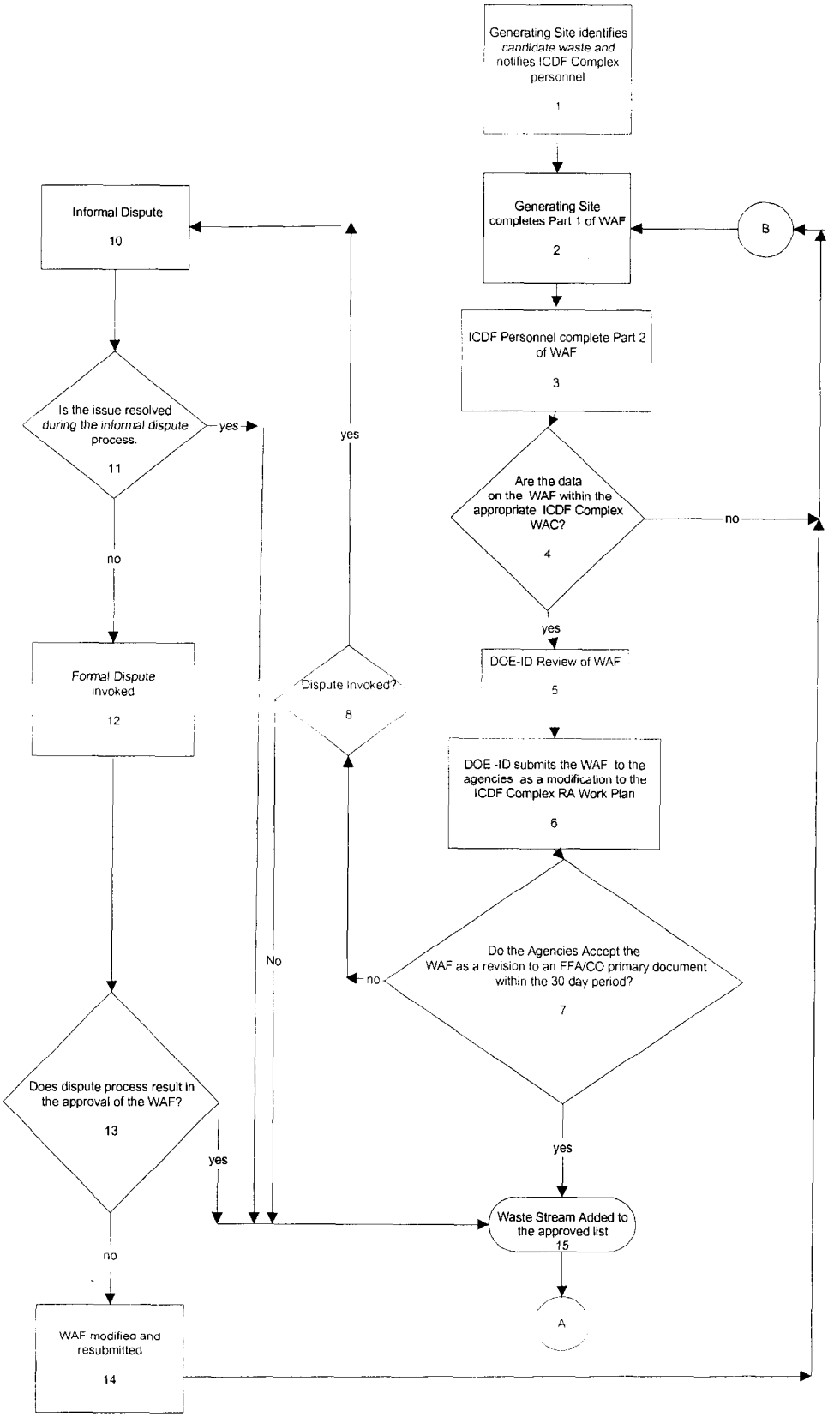


Figure 2-1 Process Flow for adding new waste streams to approved list for the ICDF Complex

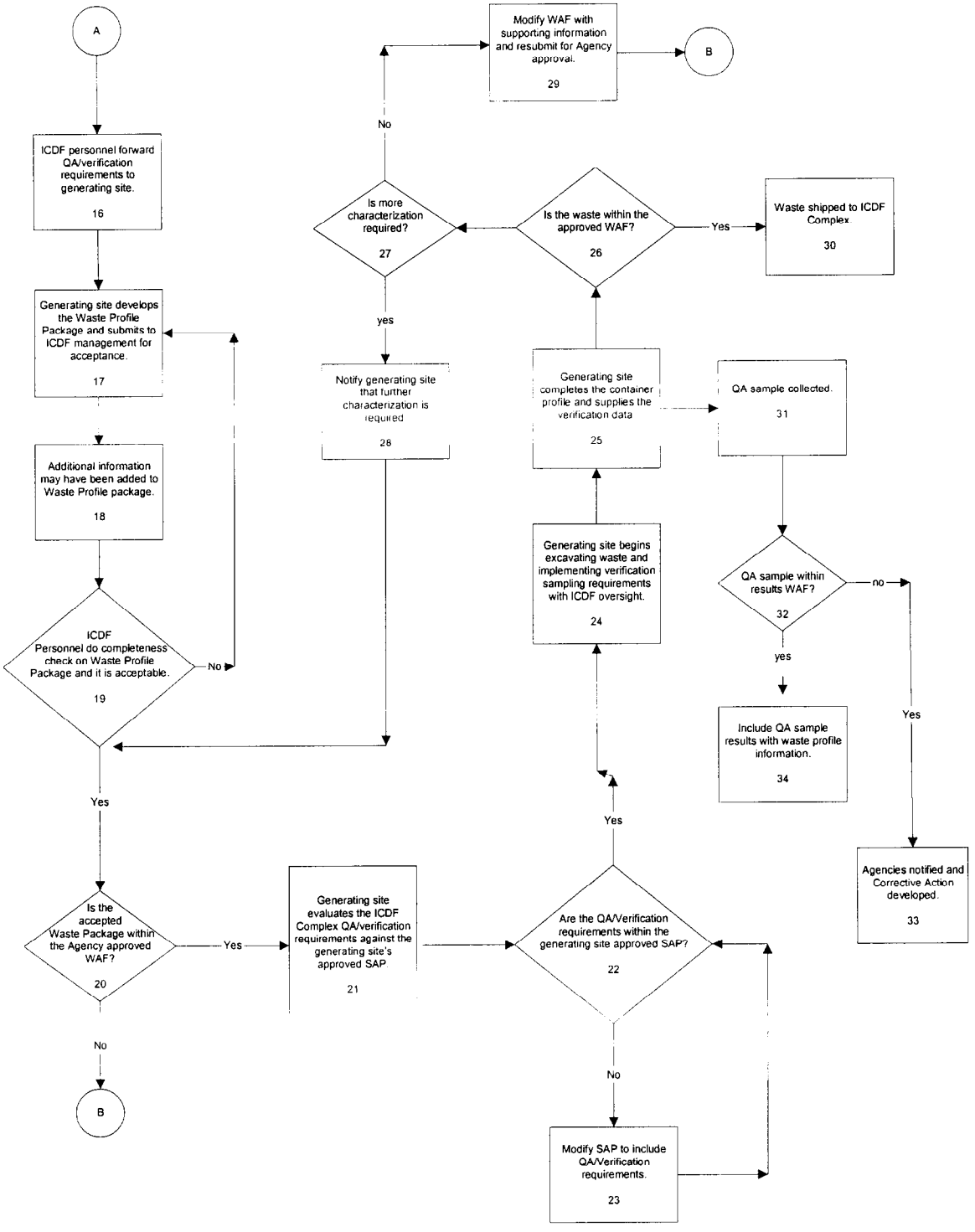


Figure 2-1 Con't.

Waste Profile package includes WAF and any additional supporting Information.
Requirements are those developed in ICDF RA WP

IPS INTERMOUNTAIN PIPING SYSTEMS

October 10, 1989

Bob Hunsinger
Atlas Mechanical Inc.
1380 Enterprise Street
Idaho Falls, ID 83402

RE: Certification of Conformance on A.O. Smith Fiberglass Pipe for ICPP Potable Water System Expansion. Subcontract Number: S-294420.

Dear Bob,

In reference to the above mentioned job, this letter is to certify that the pipe and fittings supplied will meet the following specifications.

A.O. Smith Greenthread pipe is an FRP with a minimum rating of 200 PSI @ 225F for 3" size and 150 PSI @ 225F for 4" size. This variation from specification of 25 PSI on the 4" pipe was approved by the project engineer.

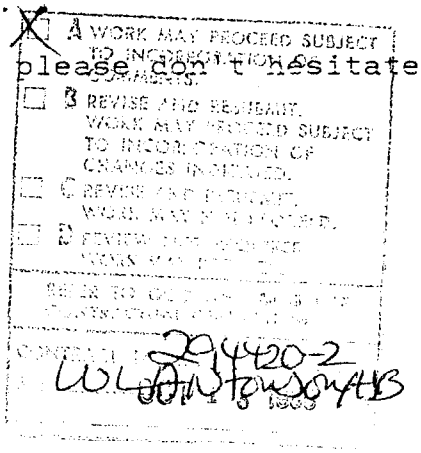
The pipe will carry the National Sanitation Foundation Std No. 14 stamp of approval and be tested and certified to meet AWWA standard C-950.

This pipe certification is for the Line Class NS in specification A-ECS-40373 Rev. 1.

If there are any questions, please don't hesitate to contact me directly.

Sincerely,

Steve Wilson
Intermountain Piping Systems



1055 West 650 North Centerville, Utah 84014 (801) 298-9696

Comment Response Tables

SSSTF 90% Draft Final:
DOE/BBWI

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SPC-1481, SSSTF SOIL STABILIZATION SYSTEM (SSS) PROCUREMENT SPECIFICATION				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
1	1.4	3 of 27	Change reference of Supplier to Subcontractor.	Changed specification to include Subcontractor and Equipment Manufacturer/Supplier. Added these to Section 1.4 "Definition of Terms".
2	General		Do a search on the words submit, supply, provide, deliver and the like. Consider anything under these categories as VDS.	Revised VDS to include all submittals.
3.	1.1	1 of 27	Under General requirements, say all equipment and components shall be new and unused. Say all electrical equipment and components shall be UL as applicable.	Revised specification as requested.
4.	Contents	2 of 2	Under contents, delete attachments 414.12, 414.12A, and 41412B. These documents will be listed as applicable to the whole contract in the Subcontract form.	Deleted attachments from specification Table of Contents as requested.
5.	1.1	1 of 27	Where do the subs find the TCLP? Is this something we need to provide or is it in RCRA?	BBWI is responsible for TCLP. Revised specification to include this statement.
6.	1.1, 3rd ¶	1 of 27	Is it only soil we are stabilizing? If not, list other potentials (i.e. tools, aggregate, whatever we know of or that could be) change the last sentence to "The quantity of soil to be stabilized is a minimum of 2060 cubic yards. The SSS shall be capable of treating a minimum of 10 cubic yards per day.	Revised specification as requested.
7.	1.1	1 of 27	Define injected parameters. Give example of solidification/stabilization agent.	Revised specification to include examples of solidification/stabilization agents.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SPC-1481, SSSTF SOIL STABILIZATION SYSTEM (SSS) PROCUREMENT SPECIFICATION

Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
8.	3.0	2 of 27 and 5 of 27	The spec says the equipment shall be designed, assembled, and installed in accordance with this Specification and Supplier's standard practices, when such practices do no conflict with the Specification. What about manufacturers installation procedures?	Added "Equipment Supplier's" Standard Practices to paragraph and added hierarchy to Section 3.0 of specification.
9.	1.2	2 of 27	Take out the 2nd paragraph. Only words relating to what should happen after award should be in the spec, what happens prior to award should be in the RFP.	Deleted second paragraph as requested.
10.	1.2	2 of 27	Define how much technical support the subcontractor shall provide, like 200 hours. In addition, put together what we expect for training by the subcontractor, how long it will take and when it will be. Have subcontractor submit training outline as VDS.	Added technical support hours to Section 8.1.3 and training support hours to Section 8.3. Added training as VDS submittal.
11.	1.2	2 of 27	Add a number 4 to say "A fully operational system in full compliance with all Contract requirements."	Revised specification as requested.
12.	1.2	2 of 27	Add a number 5 to say "Any special tools required for operation and maintenance of the system and in accordance with the Special Tools List identified in Section 4.2."	Added a number 5 to specification as requested.
13.	1.3	2 of 27	How much time allotted for the subcontractor service engineer, say 40 hours?	Deleted first bullet. Added Service Engineer technical support and training hours to Sections 8.1.3 and 8.3.
14.	1.3	3 of 27	Do we want to give the sub any parameters on the multi-port injection connections, like what size the ports need to be or any other information that will help us if we buy this equipment? What size do the connections need to be?	BBWI will provide liquid/sludge waste injection system. Added port sizes to Section 5.2.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SPC-1481, SSSTF SOIL STABILIZATION SYSTEM (SSS) PROCUREMENT SPECIFICATION				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
15.	3.0	5 of 27	Change to this: "In the event of any inconsistency between codes, standards and this specification, the inconsistency shall be resolved by giving precedence as follows: (a) codes, (b) standards and (c) specification. The Subcontractor shall refer any conflicts promptly in writing to the Contractor using the Subcontractor Field Problem form."	Revised specification as requested.
16.	4.0	7 of 27	1st sentence change to "As a minimum the Subcontractor shall provide BBWI with the submittals referenced in this Section 4. Additional submittal requirements are defined in the Vendor Data Schedule and applicable Subcontract documents." Delete everything in the second sentence in its entirety. Specifications should have no mention of the RFP, the RFP is not contractual. Any requirements for the subcontractor prior to award need to be in the RFP, any subcontractor requirements after award need to be in the subcontract, spec, drawings, special conditions etc.	Revised Section 4.0 as requested.
17	4.8, 2nd to last sentence	9 of 27	State "AutoCAD 2000 only."	Revised specification as requested.
18	4.9	10 of 27	Any specific format for the calcs, a standard to follow?	No particular standard. Added statement to Section 4.9 that "All design calculations shall be reviewed and stamped by a Registered Professional Engineer of the State of Idaho".

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SPC-1481, SSSTF SOIL STABILIZATION SYSTEM (SSS) PROCUREMENT SPECIFICATION				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
19	4.12	11 of 27	Do we want to add required turn-around times for repairs. We need to be realistic if we do, if we make turnaround times too short it will make the vendor carry a bunch of spares, which it will add to the cost of the equipment up front. Where this is a "one of a kind" system, this warranty will be very expensive, allot of risk for the vendor, especially where we're running the equipment.	Added response time for warranty items of 2 weeks.
20	5.1.1, Last sentence on page	12 of 27	Add Freeze protection shall be employed "by the subcontractor."	Revised specification as requested.
21	5.1.2	13 of 27	The statement "Achievement of stabilization……" Are we going to hold the subcontractor liable for the system until we perform this test? If so, that's what we should say.	Deleted sentence from Section 5.1.2.
22	5.1.4, Outputs	14 of 27	Reword this so it says something to the effect that the system must be able to accommodate various sizes of containers, from 2x4x8 boxes to 20 cubic yard roll on/off containers. It opens the parameters a little more and gives us more flexibility down the road.	Revised specification as requested.
23	5.1.5, Government Furnished Systems	14 of 27	Now that the subcontractor is supplying the building, the equipment etc., do we need this paragraph in there?	Changed to "Subcontractor Furnished Systems"
24	5.1.5, 1st sentence	15 of 27	Sentence is incomplete.	Removed paragraph from specification

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SPC-1481, SSSTF SOIL STABILIZATION SYSTEM (SSS) PROCUREMENT SPECIFICATION				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
25	5.1.6	15 of 27	Is this an engineered item or an off the shelf item? Is this really commercially available?	Added " to the greatest extent possible" to Section 5.1.6.
26	5.1.8	15 of 27	Warranty should only be in one place, also needs to be a VDS item.	Removed warranty from this Section (Section 4.12 addresses warranty issues) and added warranty to the VDS.
27	5.2	16 of 27	What size hole?	Added port size.
28	5.2	16 of 27	What size ports?	Added port sizes.
29	5.4	17 of 27	Do we have a size preference for the HEPA, like a standard size? We don't wan to be roped in to buying some weird size expensive nuclear grade HEPA	Revised Section 5.4 to include the size and manufacturer of the HEPA filters. The size and manufacturer is consistent with those currently stored in stock at the INEEL.
30	7.2	22 of 27	Need to expand on the performance test more. We need to say the subcontractor will provide everything needed to do performance test. Will the outcome of the performance test need to be approved by BBWI prior to shipment? How will the subcontractor test the pre-injection system if it's GFE and we don't have it yet?	Expanded Section 7.2 to include more detail for performance test.
31	7.3	22 of 27	Need more words on what we'll expect to see for the S.O. test, will we provide anything for the S.O. test or does the sub provide everything?	Expanded Section 7.3 to include more detail for performance test.
32	8.1	24 of 27	Reword entire this section based on one prime subcontractor now providing everything.	Revised Section 8.1 as requested.
33	5.2	16 of 27	Need discussion about internal washdown system or high pressure wand	Added washdown liquid disposal verbiage to first bullet in Section 5.2.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SPC-1481, SSSTF SOIL STABILIZATION SYSTEM (SSS) PROCUREMENT SPECIFICATION				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
34	8.2	24 of 27	Specify that instrumentation for controlling the process and taking data needs to be calibrated by the INEEL Calibration Laboratory.	Add sentence "Instrumentation for controlling the process and taking data must be calibrated by the INEEL Calibration Laboratory (Section 8.2)

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: Appendix B-4. SSSTF Phase 1 – Utilities-Raw Water and Potable Water (EDF-2655)				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
1	2	2 of 5	Please add the method of Operation for the Raw Water Pumps.	The text was revised to reflect the method of operation for the RAW water pumps.
2	3	5 of 5	Please add the method of Operation for the Potable Water Pumps.	The text was revised to reflect the method of operation for the Potable water pumps.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: Procurement Specification for Trailer–SPC-1484				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
1	Section 5.3	5 of 15	Perimeter frame needs to be used in lieu of outrigger to meet b / type ii-n? (Thus their foundation plan is incorrect.)	Construction Details, Frame Type: Delete outrigger, use a perimeter frame for Type II-N construction. Change made on frame type Section 5.3 page 5 of 15
2	Section 5.3	6 of 15	Should underlayment be used under roll goods?	Construction Details, Floors, Underlayment: Change to read: Underlayment not required under carpet. Recommend application of 1/4" underlayment where Congoleum is applied. This will be required in the final plans. Change Section 5.3 under Floors
3	Section 5.3	7 of 15	Exterior metal for roof 26 gauge? (Should be 24 gauge)	Construction Details, Roof: Roofing: Change the 26 gauge to 24 gauge. All exterior metal siding/roofing should be 24 gauge. Change Section 5.3 under ROOF.
4	Section 5.3	6 of 15	Thermo-Ply on exterior walls?	Construction Details, Exterior Walls, Sheathing: Delete 1/8" thermoply. Deleted 1/8" thermoply under EXTERIOR WALLS
5.	Section 5.3	6 of 15	Exterior trim .019 aluminum?	Construction Details, Exterior Walls, Exterior Trim: change .019" to 26 gauge. Changed to 26 Gage Page 6 of 15
6.	Section 5.3	7 of 15	Bow truss in roof? (type ii-n requires non-combustible material.)	Construction Details, Roof, Rafter: Replace bow truss with LOW PITCH GABLE. Changed Section 5.3 "ROOF" to LOW PITCH GABLE page 7 of 15

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: Procurement Specification for Trailer–SPC-1484				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
7.	Section 5.3	6 of 15	J-rail for rain gutter?	Construction Details, Roof, Gutters: Change Gutters to Miscellaneous. Delete reference to mill finish J-Rails (we have required canopies over all personnel doors eliminating the need for gutters). Retain vents and ties downs per code. Changed Section 5.3 "ROOF" TO NO J RAIL PAGE 6 OF 15
8.	Section 5.3	7 of 15	Pre-finished insulated door @ conf., Office, r/r? (Should be solid core.)	Construction Details, Interior Doors, Size: Change insulated to sound-insulated doors. Changed to sound-insulated doors page 7 of 15

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SSSTF Drawings				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
1.	Dwgs T-3, C-2, C-3	T-3, C-2, C-3	Based on the operations at other facilities such as Hanford. There is no need for concrete pads and asphalt within the SSSTF for storage and transporation	Because of the potential for damaging the empty container storage pad with the roll-on/roll-off containers it will be removed from the design. The pavement within the SSSTF will also be removed from the design for cost savings and ease of potential spill cleanup. See drawings, T-3, C-2 and C-3.
2.	Spec. 13120, Plan A-1	Page 7 of 12	Spec indicates bldg. Occupancy classified as F group/Division 2, which is not essential facility nor hazardous facility, but plan A-1 requires seismic important factor = 1.25 that is only required for essential & hazardous facilities per UBC table 16-K. Spec. calls seismic important factor = 1.00; Other important factors: Snow I = 1.20 per plan A-1, I = 1.0 per spec.? Wind I = 1.07 per plan A-1, I = 1.50 per spec.? Please clarify	Seismic Importance Factor is 1.0. This has been corrected on drawing. Other importance factors have been corrected also.
3.	Dwgs C-2, C-3	C-2, C-3	The stockpiles do not require silt fences, because their location is bounded by a ditch on the down-slope side and the piles will be removed during this years construction season.	Removed silt fence from stripping stockpile and added notes on slope and height of stockpile. Dwgs C-2, C-3

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SSSTF Drawings				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
4.	Dwg. U-26	U-26, Detail 27	What is the Spec. for the valves shown on for the 2" WQ line?	The gate valves in the Lift Station shall be bronze as manufactured by Stockham. The check valves in the lift station shall be cast iron as manufactured by AK Industries or GA Industries. The underground gate valves with the standpipe and cover plate shall be by CLOW. This information will be included in the spec.
5.	Dwg. U-26	U-26, Sect. N.	What is the Spec. for the pipe, fittings and valves in the Lift Station?	The spec on the pipe in the lift station shall be Sch 80 PVC. All fitting shall be compatible with the Sch 80 PVC. The subcontractor shall supply a transition piece from the PVC in the lift station to the HDPE underground pipe.
6.	Dwg. U-26	U-26, Sect. M	What is the Spec for the Check valves?	The manufacturer of the check valve shall be CLOW. The 1 inch quick disconnect shall be by CLOW or approved equal and shall be stainless steel.
7.	Dwg. U-13	U-13	Is the 4" WQ-NO-156976 to be HDPE, SDR-17.0 or PVC-SDR-35?	The 4 " pipe is 156979. Ref. Pipe 156980 on Dwg. U-14 also. These 4 " pipe shall be HDPE, SDR-17.
8.	Dwg. U-2, U-14	U-2	Sheet U-2 shows 6" RW-NO-156973 with continuation on U-14, but U-14 shows this line as 2" RW-NO-156987, which is correct?	This is a raw water service line to the decon building and should be 2-in. The 6-in will be changed to a 2-in running west from the tee on sheet U-2.
9.	Dwg. P-1, P-3	P-1, P-3	Is line 2" WW-NO-156993 that is shown on P-1 and P-3 a HDPE double contained line from SK-2 to the P-trap?	Yes. This line is a double contained line. The plans and specs will be modified to indicate this.
10.	Dwg. P-1, P-3, S-3	S-3	How does 2" WW-NO-156993 tie-in at the P-trap, does it have to tie-in with the liner.	It will tie into the liner and P-Trap with a boot and clamps similar to those shown on drawing S-3 Grid C-2.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: SSSTF Drawings				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
11.	Dwg. U-6, U-25	U-6, U-25, Detail 31	Specification Section 13505 (Underground Fire Protection Piping) page 3 lines 5&6 requires the tee connecting the new piping to the existing FP system to be protected by a sacrificial galvanic anode. Could not find any reference to this protection on any drawing.	Added sacrificial anode to valve on FW pipe for cathodic protection See Grid D-5 on dwg U-6 and detail 31 on U-25
12.	Dwg. U-6, U-25	U-6, U-25, Detail 32	How will the new potable water line connect to the existing reinforced fiberglass pipe?	Added detail to connect to Reinforced Fiberglass Pipe. See grid D-2 on U-6 and detail 32 on U-25.
13.	Dwg. U-23, U-26	U-23, U-26	Change the sanitary sewer line from DIP to Sch. 80 PVC pipe. PVC is more adaptable to the type of installation in the design.	Change DIP to PVC Sch 80 in lift stations. See dwgs U-23 and U-26.
14.	Dwg. U-24	U-24	Because of the length of the sanitary sewer line, cleanouts need to be provided.	Provided cleanouts on 2-in sanitary sewer pressure line. See Detail on dwg U-24
15.	Dwg. P-2	P-2	Hose reels for decontamination are only located on one side of the decontamination bay. Please add hose reels to both sides for ease of operation.	Added hose reels on both sides of the Decon Bay - See dwg P-2

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: Design Specifications –SPC-1485				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
1	Section 08362	Page 1 of 4, Line 14	Section states door color to match metal building, whereas Line 15, Page 3 of 4 states door to be white.	Eliminate references to colors and request color submittals. Will change to require a color chip submittal.
2	Section 08362,	Page 2 of 4, Lines 40 & 41	Section states that high lift to be provided sot that Door encroaches interior no more than 6'. But in Drawings, Sheet A-5 precludes enough high lift to make that happen. It appears that there is not adequate headroom.	Line 40 reads, "Where possible," the high lift should be provided. Will add: All other doors will be standard lift Changed these lines as noted.
3.	Section 08362,	Page 3 of 4, Lines 42 & 43	Section states that 50,000 cycle springs are required but, in Page 2 of 4, Lines 23 & 24 100,000 cycle springs are requested. Which is it?	The specification was changed from 50,000 cycle to 100,000 to be consistent.
4.	Section 03300	Page 3 of 14	What is the aggregate size on the Post Tensioned slab and will a pea size gravel mix be available to provide for adequate cover within the 5" slab, tendons, anchors, rebar, etc. Need to ensure that there is no chance of honeycomb or rock pockets neat any of the anchorages/rebar/column areas, pea-size aggregate will help ensure adequate paste surrounds all the nccessary slab components further reducing danger to workers when stressing tendons	Maximum aggregate size of 1" for PT slab will be added to concrete spec section 03300 (since this spec is called out for the post-tensioned slab portions). This is better than the 1 5/8 in maximum size previously allowed for PT slabs and should improve coverage. See lines 42-43 on page 03300-3 of 14

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: Design Specifications –SPC-1485

Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
5.	Spec. 13120, Dwg. A-2	Page 6 of 12	Spec. calls "Clear height (below frame at column) shall be 20 ft. minimum. Drawing shows that eave height of bldg. Is 17'-0", which is lower than clear height? Please clarify.	The 20-ft minimum will be deleted from the spec. The frame shall be based on the 17' 0" eve height. See lines 37-38 Section 13120 - 6 of 12
6.	Spec. 13120-, Plan A-1	Page 7 of 12	Spec indicates bldg. Occupancy classified as F group/Division 2, which is not essential facility nor hazardous facility, but plan A-1 requires seismic important factor = 1.25 that is only required for essential & hazardous facilities per UBC table 16-K. Spec. calls seismic important factor = 1.00; Other important factors: Snow I = 1.20 per plan A-1, I = 1.0 per spec.? Wind I = 1.07 per plan A-1, I = 1.50 per spec.? Please clarify	Seismic Importance Factor is 1.0. This has been corrected on drawing. Other importance factors have been corrected also. See first 3 paragraphs on sheet 13120-7 of 12 and drawing A-1
7.	Spec. 13120	Page 1 of 12	The Specification Section 13120 lists several Related Sections including Section 05060- Structural Welding. This section cannot be located in the specifications or table of contents. Please clarify.	Section 05060-Structural Welding doesn't apply and will be taken out of the spec. See related sections on page 13120-1 of 12

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: Design Specifications –SPC-1485				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
8.	Spec. Sects 02713, 02722, 02732	02713, Page 2 of 7 02722, Page 2 of 8 02732, Page 2 of 8	Please have the Subcontractor submit a procedure and QA requirements for fusing the HDPE pipe.	Required Subcontractor (S/C) to submit fusion procedures, product data, test procedures, certifications on all HDPE pipe (See 02713 2 of 7, 02722 2 of 8, and 02732 2 of 8).

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: DOE/ID-10873 CONSTRUCTION WASTE MANAGEMENT PLAN				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
1	Acronyms	viii	Add RD/CWP to acronym list	Added "RD/CWP remedial design/construction work plan" to acronym list.
2	Section 1.	1-1	Clarify where ICDF Complex operations waste management will be addressed.	Added "...and will be included in the ICDF Complex Remedial Action (RA) Work Plan (WP)." to the end of the last sentence of the first paragraph.
3.	Fig. 2-2	2-3	Update Figure 2-2.	Placed updated figure into page 2-3.
4.	Section 4.1	4-1	This Section contains confusing and contradicting wording. Please clarify.	Section was rewritten as necessary to clarify the section.
5.	Section 4.3.1	4-2	This Section is confusing. Please clarify.	Wording in all three paragraphs were modified to clarify the section.
6.	Section 4.3.3	4-3	First sentence is not clear. Please clarify.	First sentence was rewritten as follows: "Any unexpected waste will go through the HWD process. If the waste is determined to be conditional industrial, radioactively contaminated, or hazardous it will be tracked as CERCLA waste by the INEEL's electronic database."
7.	Section 4.4	4-3	First sentence doesn't apply to industrial waste. Please modify.	First sentence was rewritten to read as follows: "Packaging of all radioactively contaminated and hazardous waste materials generated will be in compliance with the RCRA regulations found in 40 CFR 264 Subpart I and the applicable Department of Transportation (DOT) regulations found in 49 CFR 172."
8.	Section 4.5	4-3 and 4-4	This Section is confusing. Please clarify.	Section was rewritten as necessary to clarify the section.

SSSTF 90% DRAFT FINAL DESIGN PACKAGE
DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – DOE/BBWI

DOCUMENT TITLE: TFR-17, Technical and Functional Requirements – WAG 3 Staging, Storage, Sizing, and Treatment Facility				
Item	Section/ Figure/ Appendix	Page	Comment	Responsible Person and Resolution
1	3.1.2.3	25	Delete the "(NA for Phase 1)" for Reqt ID 043 Change text to read: "The SSSTF shall provide for storage of secondary waste."	Phrase was deleted. There is no longer a Phase 1. Text was changed to clarify storage area.